

Part 70 Operating Permit Amendment

Permit Amendment No.: 2899-179-0011-V-02-5 **Effective Date:** May 13, 2011

Facility Name: SNF – Riceboro

Facility Address Chemical Plant Road
Riceboro, Georgia 31323, Liberty County

Mailing Address: P.O. Box 250
Riceboro, GA 31323

Parent/Holding Company: SNF Holding Corporation

Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Revision of toxic impact assessment limit for Powder Plant Line 5 UERXR stack in Condition 3.2.1.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2899-179-0011-V-02-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit No. 2899-179-0011-V-02-0.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-20056 dated November 11, 2010; any other applications upon which this Permit Amendment or Permit No. 2899-179-0011-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 2 pages.

[Signed]

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

This permitting action is for the revision of the toxic impact assessment limit for acrylic acid from the Powder Plant Line 5 UERXR stack in Condition 3.2.1.a.ii. This limit is being raised from 0.01 lb/hr to 0.03 lb/hr. A revised toxic impact assessment was performed at the proposed emission rate. The acrylamide limit from this stack and the acrylamide and acrylic acid limits from all other stacks are not being modified.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.2 Equipment Emission Caps and Operating Limits

3.2.1 The Permittee shall not discharge or cause the discharge into the atmosphere from:
[Toxic Guideline - 391-3-1-.02(2)(a)1]

- a. Powder Plant Line 5 (Source Code P5) reactor stack (Stack UERXR) at the Chemtall Plant any gases which:
 - i. Contain acrylamide in excess of 0.0612 pounds per hour.
 - ii. Contain acrylic acid in excess of 0.030 pounds per hour
- b. Powder Plant Line 5 (Source Code P5) dryer stack (Stack UEDRYER) or the Powder Plant Line 6 (Source Code P6) dryer stack (Stack UFDRYER) at the Chemtall Plant any gases which:
 - i. Contain acrylamide in excess of 0.11 pounds per hour.
 - ii. Contain acrylic acid in excess of 1.66 pounds per hour.
- c. Powder Powder Plant Line 6 (Source Code P6) reactor stack (Stack UFRXR) at the Chemtall Plant any gases which:
 - i. Contain acrylamide in excess of 0.0612 pounds per hour.
 - ii. Contain acrylic acid in excess of 0.010 pounds per hour.

SIP CONSTRUCTION PERMIT AND TITLE V MINOR MODIFICATION APPLICATION REVIEW

Facility Name: **SNF – Riceboro**

City: Riceboro

County: Liberty

AIRS #: 04-13-17900011

Application #: 20530

Date SIP Application Received: June 24, 2011

Date Title V Application Received: June 24, 2011

Permit No: 2899-179-0011-V-02-6

Program	Review Engineers	Review Managers
SSPP	Heather Cottrell	David Matos
SSCP	Farhana Yasmin	Douglas Waldron
ISMP	Marcus Cureton	Richard Taylor
TOXICS	N/a	N/a
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2899-179-0011-V-02-0	March 12, 2010	X	
2899-179-0011-V-02-1	June 7, 2010	X	
2899-179-0011-V-02-2	November 1, 2010	X	
2899-179-0011-V-02-3	November 15, 2010	X	
2899-179-0011-V-02-4	February 24, 2011	X	
2899-179-0011-V-02-5	May 13, 2011	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2899-179-0011-V-02-0	Renewal permit.
2899-179-0011-V-02-1	502(b)(10) for miscellaneous pneumatic conveyance lines, product transfer storage bins, and truck loading equipment with dust collectors.
2899-179-0011-V-02-2	502(b)(10) for a new continuous acrylates plant, two new boilers, and inclusion of MON for the existing continuous acrylates plant.
2899-179-0011-V-02-3	502(b)(10) for a new continuous chloromethylation line with thermal oxidizer, and an increase in production for two existing chloromethylation lines.
2899-179-0011-V-02-4	Significant modification issued for the revision of toxic impact assessment limits for Powder Plant Line P11 and Chemtall Stack SE19, the construction of small dust collectors at Powder Plant Lines P9, P10, and P11, the construction of drum dryers DD5 and DD6, and the revision of excursion values for Baghouses CP2F and CP2G.
2899-179-0011-V-02-5	Significant modification the revision of an acrylic acid limit.

B. Regulatory Status

1. PSD/NSR/RACT

The facility is classified as a major source under PSD regulations. The facility has taken the following limits to avoid PSD review:

- The production of IPA-dispersants in Liquids Product Lines 1 through 12 (Source Codes LQ01 through LQ12) is limited to 262,800 tons per consecutive twelve-month period.
- Scrubber CE4A/4B must reduce inlet emissions of sulfur dioxide by at least 96 percent.
- The emissions of sulfur dioxide from Liquids Product Lines 1 through 12 (Source Codes LQ01 through LQ12) must not equal or exceed 40 tons during any consecutive twelve-month period.
- The production of IPA-dispersants in Liquids Product Line 13 (Source Code LQ13) is prohibited.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓	✓		
CO	✓	✓		
TRS				
H ₂ S				
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification

The facility has proposed to replace the existing fines dryer baghouses (Source Codes CP8C and CP9C) at Powder Plants P8 and P9. The dust collectors will be changed from a bag-type filter to a cartridge-type filter. The modification will require the pressure drop operating range to change from 1.0 to 10.0 inches of water to 0.1 to 10.0 inches of water. The new baghouses are expected to operate in the range of 0.3 to 0.5 inches of water.

B. Emissions Change

There will be no change in emissions due to this modification. The new baghouses will provide equal or better control of particulate matter emissions from the fines dryers.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	0	0
PM ₁₀	Yes	0	0
SO ₂			
VOC			
NO _x			
CO			
TRS			
H ₂ S			
Individual HAP			
Total HAPs			

C. PSD/NSR Applicability

The modification is not subject to PSD or NSR.

III. Facility Wide Requirements

- A. Emission and Operating Caps: There are no facility wide emission or operating cap changes associated with this modification.
- B. Applicable Rules and Regulations: There are no facility wide applicable rules and regulations associated with this modification.
- C. Compliance Status: The facility has indicated compliance for all applicable rules and regulations.
- D. Operational Flexibility: There are no facility wide operating flexibility issues associated with this modification.
- E. Permit Conditions: There are no facility wide permit condition changes associated with this modification.

IV. Regulated Equipment Requirements

- A. Brief Process Description

Please see Part 1.0 of Air Quality Permit No. 2899-179-0011-V-02-0 for a complete process description.

- B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CHEMTALL PLANT					
PP – Powder Plant					
P8	Powder Plant Line 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, 6.1.7, and 6.2.72*	CP8A through CP8D	Baghouses
P9	Powder Plant Line 9	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, 5.2.18, 5.2.19, 6.1.7, 6.2.71, and 6.2.72*	CP9A through CP9D CP9E CP9F	Baghouses Dust Collectors

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive

- C. Equipment & Rule Applicability

There are no rule applicability changes as a result of this modification.

- D. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

- E. Operational Flexibility

There are no operational flexibility issues associated with this modification.

- F. Permit Conditions

There are no condition changes for Part 3.0 of the permit.

V. Testing Requirements (with Associated Record Keeping and Reporting)

- A. Individual Equipment: There are no testing requirements associated with this modification.

SIP CONSTRUCTION PERMIT AND TITLE V MINOR MODIFICATION APPLICATION REVIEW

- B. Equipment Groups (all subject to the same test requirements): There are no testing requirements associated with this modification.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

- A. Individual Equipment: There are no monitoring requirement changes associated with this modification.
- B. Equipment Groups (all subject to the same monitoring requirements): There are no monitoring requirement changes associated with this modification.

VII. Other Record Keeping and Reporting Requirements

Conditions 6.1.7.c.ix and 6.1.7.c.xxi have been modified to accommodate the excursion range change for the replacement baghouses.

Condition 6.2.72 has been added to the permit. The condition requires the facility to notify the Division upon startup of the replacement baghouses.

VIII. Specific Requirements

- A. Operational Flexibility: Not Applicable.
- B. Alternative Requirements: Not Applicable.
- C. Insignificant Activities: Not Applicable.
- D. Temporary Sources: Not Applicable.
- E. Short-Term Activities: Not Applicable.
- F. Compliance Schedule/Progress Reports: Not Applicable.
- G. Emissions Trading: Not Applicable.
- H. Acid Rain Requirements: Not Applicable.
- I. Prevention of Accidental Releases: This modification does not change the source's applicability.
- J. Stratospheric Ozone Protection Requirements: This modification does not change the source's applicability.
- K. Pollution Prevention: Not Applicable.
- L. Specific Conditions: Not Applicable.

Addendum to Narrative

The 45-day EPA review started on September 14, 2011 and ended on October 28, 2011. Comments were not received by the Division.

Part 70 Operating Permit Amendment

Permit Amendment No.: 2899-179-0011-V-02-6 **Effective Date:** November 10, 2011

Facility Name: SNF – Riceboro

Facility Address: Chemical Plant Road
Riceboro, Georgia 31323, Liberty County

Mailing Address: P.O. Box 250
Riceboro, Georgia 31323

Parent/Holding Company: SNF Holding Corporation

Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

The replacement of bag-type filter Baghouses CP8C and CP9C with cartridge-type filter baghouses.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2899-179-0011-V-02-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 20530 dated June 22, 2011; any other applications upon which this Permit Amendment or Permit No. 2899-179-0011-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 3 pages.

[Signed]

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

The facility has proposed to replace the existing fines dryer baghouses (Source Codes CP8C and CP9C) at Powder Plants P8 and P9. The dust collectors will be changed from a bag-type filter to a cartridge-type filter.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.6 Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CHEMTALL PLANT					
PP – Powder Plant					
P8	Powder Plant Line 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, 6.1.7, and 6.2.72*	CP8A through CP8D	Baghouses
P9	Powder Plant Line 9	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, 5.2.18, 5.2.19, 6.1.7, 6.2.71, and 6.2.72*	CP9A through CP9D CP9E CP9F	Baghouses Dust Collectors

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

Chemtall Plant

- ix. Any two consecutive readings during which the pressure drop for a baghouse associated with the Powder Plant or Drum Drying Process (Equipment Groups PP and DD) at the Chemtall Plant, except for Source Codes CP2F, CP2G, CP8C, and CP9C, measured and recorded in accordance with Condition 5.2.2.d, is less than 1.0 inch of water or greater than 10.0 inches of water.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- xxi. Any two consecutive readings during which the pressure drop for Baghouse CP2F, CP2G, CP8C or CP9C at the Chemtall Plant, measured and recorded in accordance with Condition 5.2.2.d, is less than 0.1 inch of water or greater than 10.0 inches of water.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

6.2 Specific Record Keeping and Reporting Requirements

6.2.72 The Permittee shall submit to the Division a notification of the actual date of the initial startup of replacement Baghouses CP8C and CP9C. This notification shall be postmarked within 15 days of the actual startup date.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **SNF – Riceboro**

City: Riceboro

County: Liberty

AIRS #: 04-13-179-00011

Application #: 20586 and 20829

Date SIP Application Received: N/a

Date Title V Application Received: July 28, 2011 and November 15, 2011

Permit No: 2899-179-0011-V-02-8

Program	Review Engineers	Review Managers
SSPP	Heather Cottrell	David Matos
SSCP	Farhana Yasmin	Douglas Waldron
ISMP	Marcus Cureton	Richard Taylor
TOXICS	Sherry Waldron	Michael Odom
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2899-179-0011-V-02-0	March 12, 2010	X	
2899-179-0011-V-02-1	June 7, 2010	X	
2899-179-0011-V-02-2	November 1, 2010	X	
2899-179-0011-V-02-3	November 15, 2010	X	
2899-179-0011-V-02-4	February 24, 2011	X	
2899-179-0011-V-02-5	May 13, 2011	X	
2899-179-0011-V-02-6	November 10, 2011	X	
2899-179-0011-V-02-7	January 19, 2012	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2899-179-0011-V-02-0	Renewal permit.
2899-179-0011-V-02-1	502(b)(10) for miscellaneous pneumatic conveyance lines, product transfer storage bins, and truck loading equipment with dust collectors.
2899-179-0011-V-02-2	502(b)(10) for a new continuous acrylates plant, two new boilers, and inclusion of MON for the existing continuous acrylates plant.
2899-179-0011-V-02-3	502(b)(10) for a new continuous chloromethylation line with thermal oxidizer, and an increase in production for two existing chloromethylation lines.
2899-179-0011-V-02-4	Significant modification issued for the revision of toxic impact assessment limits for Powder Plant Line P11 and Chemtall Stack SE19, the construction of small dust collectors at Powder Plant Lines P9, P10, and P11, the construction of drum dryers DD5 and DD6, and the revision of excursion values for Baghouses CP2F and CP2G.
2899-179-0011-V-02-5	Significant modification the revision of an acrylic acid limit.
2899-179-0011-V-02-6	Minor modification for the replacement of Baghouses CP8C and CP9C.
2899-179-0011-V-02-7	Minor modification for the revision of the periodic reporting deadlines in Conditions 6.1.3, 6.1.4, and 8.14.1.

B. Regulatory Status

1. PSD/NSR/RACT

The facility is classified as a major source under PSD regulations. The facility has taken the following limits to avoid PSD review:

- The production of IPA-dispersants in Liquids Product Lines 1 through 12 (Source Codes LQ01 through LQ12) is limited to 262,800 tons per consecutive twelve-month period.
- Scrubber CE4A/4B must reduce inlet emissions of sulfur dioxide by at least 96 percent.
- The emissions of sulfur dioxide from Liquids Product Lines 1 through 12 (Source Codes LQ01 through LQ12) must not equal or exceed 40 tons during any consecutive twelve-month period.
- The production of IPA-dispersants in Liquids Product Line 13 (Source Code LQ13) is prohibited.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓	✓		
CO	✓	✓		
TRS				
H ₂ S				
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification

Application No. 20586

SNF is currently permitted to construct and operate twelve Liquids Product Lines (Source Codes LQ01 – LQ12), which are permitted to vent to Scrubber CE4A/B. As of July 2011 only five of the lines have been installed. SNF has proposed to construct two of the lines (Source Codes LQ11 and LQ12) as Emulsion Lines 46 and 47 and vent them to existing Scrubber SE3A/B and stack SE51 rather than Scrubber CE4A/B.

Equipment that exhausts through stack SE51 is subject to acrylamide and acrylic acid emission limits of 0.613 pounds per year and 691 pounds per year, respectively. SNF is not requesting a change in these limits; therefore, modeling is not required for this permitting action.

Application No. 20829

The application proposes a change in the source codes for the Powder Plant P8 and P9 fines dryer baghouses from CP8C and CP9C to CP8D and CP9D to be consistent with plant terminology.

B. Emissions Change

Application No. 20586

The control efficiencies of the pollutants associated with the production lines are the same for Scrubbers CE4A/B and SE3A/B. There is no anticipated increase in emissions from this change.

Application No. 20829

There will be no change in emissions due to this modification.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	0	0
PM ₁₀	Yes	0	0
SO ₂			
VOC	Yes	0	0
NO _x			
CO			
TRS			
H ₂ S			
Individual HAP	Yes	0	0
Total HAPs	Yes	0	0

C. PSD/NSR Applicability

These modifications are not subject to PSD/NSR.

III. Facility Wide Requirements

- A. Emission and Operating Caps – There are no facility wide emission or operating caps associated with this modification.
- B. Applicable Rules and Regulations – There are no new applicable rules or regulations associated with this modification.
- C. Compliance Status – There are no facility wide rules or regulations associated with this modification.
- D. Operational Flexibility – There are no operational flexibility issues associated with this modification.
- E. Permit Conditions – There are no facility wide permit conditions associated with this modification.

IV. Regulated Equipment Requirements

A. Brief Process Description

Application No. 20586

The Chemtall Plant is capable of producing emulsion polymers, solution polymers, dispersants, dry strength polymers, and wet strength polymers. Please see the narrative for Air Quality Permit No. 2899-179-0011-V-02-0 for a complete description of the wet product lines.

Application No. 20829

The Chemtall powder plants produce polyacrylamide powder flocculants. The facility uses dust collectors to control particulate matter emissions. Please see the narrative for Air Quality Permit No. 2899-179-0011-V-02-0 for a complete description of the powder flocculants process.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CHEMTALL PLANT					
EM – Emulsion Plant					
EM34 through EM47	Emulsion Plant Lines 34 – 39, 46, and 47	40 CFR 63 Subpart FFFF ²	3.2.7, 3.3.23, 3.3.57, 3.3.65, 4.2.8, 4.2.12, 4.2.22, 5.2.2, 6.1.7, 6.2.14, 6.2.15, and 6.2.23 through 6.2.25*	SE3A SE3B	Two-Stage Packed-Bed Scrubber
LQ – Liquids Product Lines					
LQ01 through LQ10	Liquids Product Lines 1 – 10	40 CFR 63 Subpart FFFF ² 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.8 through 3.2.11, 3.3.23, 3.3.57, 3.3.65, 3.4.3, 3.4.4, 4.2.9, 4.2.10, 4.2.12, 4.2.22, 5.2.2, 6.1.7, 6.2.16 through 6.2.19, 6.2.21, and 6.2.23 through 6.2.25*	CE4A CE4B	Two-Stage Packed-Bed Scrubber

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.
¹ Group 1 Source; ² Group 2 Source; ³ Group 1 Source for MMA / Group 2 Source for MA, but controlled at all times.

C. Equipment & Rule Applicability

Application No. 20586

The Emulsion Lines are classified as Group 2 sources under 40 CFR 63 Subpart FFFF. The modification does not change the source's status, as demonstrated by the group analysis dated December 8, 2011. The subpart does not require controls or monitoring for Group 2 sources. There will be no changes in applicable rules as a result of this modification.

Application No. 20829

There are no equipment or rule applicability changes associated with this modification.

D. Compliance Status

The applications indicate that the equipment will comply with all applicable rules and regulations.

E. Operational Flexibility

There are no operational flexibility issues associated with this modification.

F. Permit Conditions

Application No. 20586

Condition 3.2.7 has been modified to include reference to Emulsion Plant Lines 46 and 47, which will vent through Scrubber SE3A/B and Stack SE51.

Conditions 3.2.8 through 3.2.11 have been modified to remove reference to Liquids Product Lines 11 and 12.

Application No. 20829

There are no condition changes associated with Application No. 20829.

V. Testing Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment:

Application No. 20586

Condition 4.2.8 has been modified to include reference to Emulsion Plant Lines 46 and 47, which will vent through Scrubber SE3A/B and Stack SE51.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Conditions 4.2.9 and 4.2.10 have been modified to remove reference to Liquids Product Lines 11 and 12.

Condition 4.2.22 has been added to the permit to clarify testing requirements. The condition specifies the testing requirements in the event that the facility only builds a portion of the permitted production lines. It prevents a source from avoiding testing requirements in the event a group of multiple lines is not completed.

Application No. 20829

There are no condition changes associated with Application No. 20829.

- B. Equipment Groups (all subject to the same test requirements):

Not Applicable.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

- A. Individual Equipment:

There are no changes to the monitoring section of the permit for either project. The existing permit contains the necessary monitoring for Scrubber SE3A/B as related to Application No. 20586 and for baghouses as related to Application No. 20829.

- B. Equipment Groups (all subject to the same monitoring requirements):

Not Applicable.

VI. Other Record Keeping and Reporting Requirements

Application No. 20586

Condition 6.1.7.b.v has been modified to include reference to Emulsion Plant Lines 46 and 47, which will vent through Scrubber SE3A/B and Stack SE51.

Conditions 6.1.7.b.vi through 6.1.7.b.viii have been modified to remove reference to Liquids Product Lines 11 and 12.

Condition 6.1.7.d.ii and 6.1.7.d.iii have been modified to remove reference to Liquids Product Lines 11 and 12.

Conditions 6.2.14 and 6.2.15 have been modified to include reference to Emulsion Plant Lines 46 and 47.

Conditions 6.2.16 through 6.2.19 have been modified to remove reference to Liquids Product Lines 11 and 12.

Condition 6.2.21 has been modified to remove reference to Scrubber CE4A/B and include reference to Scrubber SE3A/B. The reference to Liquids Product Lines 11 and 12 have been changed to Emulsion Plant Lines 46 and 47.

Application No. 20829

Conditions 6.1.7.c.ix, 6.1.7.c.xxi, and 6.2.72 have been modified to change the source codes for the Powder Plant P8 and P9 fines dryer baghouses from CP8C and CP9C to CP8D and CP9D.

VII. Specific Requirements

- A. Operational Flexibility – Not Applicable.
- B. Alternative Requirements– Not Applicable.
- C. Insignificant Activities – Not Applicable.
- D. Temporary Sources – Not Applicable.
- E. Short-Term Activities – Not Applicable.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

- F. Compliance Schedule/Progress Reports – Not Applicable.
- G. Emissions Trading – Not Applicable.
- H. Acid Rain Requirements – Not Applicable.
- I. Prevention of Accidental Releases – Not Applicable.
- J. Stratospheric Ozone Protection Requirements – Not Applicable.
- K. Pollution Prevention – Not Applicable.
- L. Specific Conditions – Not Applicable.

Addendum to Narrative

The 45-day EPA review started on February 16, 2012 and ended on April 2, 2012. Comments were not received by the Division.

Part 70 Operating Permit Amendment

Permit Amendment No.: 2899-179-0011-V-02-8 **Effective Date:** April 17, 2012

Facility Name: SNF – Riceboro

Facility Address Chemical Plant Road
Riceboro, Georgia 31323, Liberty County

Mailing Address: P.O. Box 250
Riceboro, Georgia 31323

Parent/Holding Company: SNF Holding Company

Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Reclassifying Liquid Product Lines 11 and 12 as Emulsion Plant Lines 46 and 47. The lines will vent to existing Scrubber SE3A/B and stack SE51 rather than Scrubber CE4A/B. The amendment is also for a change in the source codes for the Powder Plant P8 and P9 fines dryer baghouses from CP8C and CP9C to CP8D and CP9D.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2899-179-0011-V-02-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit No. 2899-179-0011-V-02-0.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-20586 dated July 22, 2011 and Application No. TV-20829 dated November 11, 2011; any other applications upon which this Permit Amendment or Permit No. 2899-179-0011-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 8 pages.

[Signed]

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**Application No. 20586

SNF has proposed to change Liquids Product Lines 11 and 12 to Emulsion Plant Lines 46 and 47. The lines will vent to existing Scrubber SE3A/B and stack SE51 rather than Scrubber CE4A/B.

Application No. 20829

SNF has proposed to change the source codes for the Powder Plant P8 and P9 fines dryer baghouses from CP8C and CP9C to CP8D and CP9D to be consistent with plant terminology.

Title V Permit Amendment

SNF - Riceboro

Permit Amendment No.: 2899-179-0011-V-02-8

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.8 Additional Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CHEMTALL PLANT					
EM – Emulsion Plant					
EM34 through EM39 EM46 EM47	Emulsion Plant Lines 34 – 39, 46, and 47	40 CFR 63 Subpart FFFF ²	3.2.7, 3.3.23, 3.3.57, 3.3.65, 4.2.8, 4.2.12, 4.2.22, 5.2.2, 6.1.7, 6.2.14, 6.2.15, and 6.2.23 through 6.2.25*	SE3A SE3B	Two-Stage Packed-Bed Scrubber
LQ – Liquids Product Lines					
LQ01 through LQ10	Liquids Product Lines 1 – 10	40 CFR 63 Subpart FFFF ² 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.8 through 3.2.11, 3.3.23, 3.3.57, 3.3.65, 3.4.3, 3.4.4, 4.2.9, 4.2.10, 4.2.12, 4.2.22, 5.2.2, 6.1.7, 6.2.16 through 6.2.19, 6.2.21, and 6.2.23 through 6.2.25*	CE4A CE4B	Two-Stage Packed-Bed Scrubber

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

¹ Group 1 Source; ² Group 2 Source; ³ Group 1 Source for MMA / Group 2 Source for MA, but controlled at all times.

3.2 Equipment Emission Caps and Operating Limits

Chemtall Plant

3.2.7 The Permittee shall not discharge or cause the discharge into the atmosphere from Emulsion Plant Lines 34 through 39, 46, and 47 (Source Code EM34 through EM39, EM46, and EM47) through Stack SE51 at the Chemtall Plant any gases which:
[Toxic Guideline - 391-3-1-.02(2)(a)1]

- a. Contain acrylamide in excess of 0.613 pounds during any consecutive twelve-month period.
- b. Contain acrylic acid in excess of 691 pounds during any consecutive twelve-month period.

3.2.8 The Permittee shall not discharge or cause the discharge into the atmosphere from Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) through Stack SE52 at the Chemtall Plant any gases which:
[Toxic Guideline - 391-3-1-.02(2)(a)1]

- a. Contain acrylamide in excess of 1.13 pounds during any consecutive twelve-month period.
- b. Contain acrylic acid in excess of 1,382 pounds during any consecutive twelve-month period.

3.2.9 The Permittee shall not produce more than 262,800 tons of IPA-dispersants in Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant per consecutive twelve-month period.
[Avoidance of 40 CFR 52.21]

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- 3.2.10 The Permittee shall cause Scrubber CE4A/4B to be operated so as to reduce inlet sulfur dioxide emissions by 96 percent or greater whenever sulfur dioxide is being vented from Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant.
[Avoidance of 40 CFR 52.21]
- 3.2.11 The Permittee shall not discharge or cause the discharge into the atmosphere from Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant, emissions of sulfur dioxide in amount equal to or exceeding 40 tons during any consecutive twelve-month period.
[Avoidance of 40 CFR 52.21]

PART 4.0 REQUIREMENTS FOR TESTING**4.2 Specific Testing Requirements****Chemtall Plant**

- 4.2.8 Within 60 days after achieving the maximum production rate at which Emulsion Plant Lines 34 through 39, 46, and 47 (Source Codes EM34 and EM39, EM46, and EM47) at the Chemtall Plant will be operated, but no later than 180 days after startup, the Permittee shall conduct acrylamide and acrylic acid performance tests on Stack SE51 (Scrubber SE3A/3B). The Permittee shall, at a minimum, conduct the testing while processing the worst-case product batch(es) for acrylamide and acrylic acid. The testing shall be conducted over the entire batch and the data shall be used to develop emission factors in terms of pounds of acrylamide / acrylic acid per ton of product. The Permittee may elect to test other product batches in addition to those discussed above for the purpose of obtaining data for specific product mixes. The results of the performance test shall be submitted to the Division within 60 days of the completion of testing.
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]
- 4.2.9 Within 60 days after achieving the maximum production rate at which the Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant will be operated, but no later than 180 days after startup, the Permittee shall conduct acrylic acid and acrylamide performance tests on Stack SE52 (Scrubber CE4A/4B) following the modification proposed in Air Quality Application No. 15963. The Permittee shall, at a minimum, conduct the testing while processing the worst-case product batch(es) for acrylamide and acrylic acid. The testing shall be conducted over the entire batch and the data shall be used to develop emission factors in terms of pounds of acrylamide / acrylic acid per ton of product. The Permittee may elect to test other product batches in addition to those discussed above for the purpose of obtaining data for specific product mixes. The results of the performance test shall be submitted to the Division within 60 days of the completion of testing.
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]
- 4.2.10 Following the issuance of this permit amendment, within 60 days after achieving the maximum production rate at which the Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant will be operated, but no later than 180 days after startup, the Permittee shall conduct sulfur dioxide performance tests for the inlet gas and outlet gas streams for Scrubber CE4A/4B to demonstrate compliance with Conditions 3.2.10 and 3.2.11. During the test the Permittee shall establish minimum values or a range of values for pressure drop, scrubbing flow rate, and scrubbing pH for Scrubber CE4A/4B to be used in determining excursions under Condition 6.1.7.
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]
- 4.2.22 For the purposes of Conditions 4.2.6 through 4.2.10, if the Permittee constructs and starts up permitted production lines in phases, performance testing is required for the startup of each phase. A phase means the startup of one or more lines but not all permitted lines. The test shall be conducted within 60 days after achieving the maximum production rate for the new phase of line(s), but no later than 180 days after startup of the new phase of line(s).
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

Chemtall Plant

- v. Any 12-month rolling period during which the acrylamide or acrylic acid emissions from Emulsion Plant Lines 34 through 39, 46, and 47 (Source Code EM34 through EM39, EM46, and EM47) at the Chemtall Plant, calculated in accordance with Condition 6.2.15, is in excess of the limit in Condition 3.2.7.
[Toxic Guideline - 391-3-1-.02(2)(a)1]
 - vi. Any 12-month rolling period during which the facility produces more than 262,800 tons of IPA-dispersants in Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant.
[Avoidance of 40 CFR 52.21]
 - vii. Any 12-month rolling period during which the sulfur dioxide emissions from Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant, calculated in accordance with Condition 6.2.17 is equal to or in excess of 40 tons.
[Avoidance of 40 CFR 52.21]
 - viii. Any 12-month rolling period during which the acrylamide or acrylic acid emissions from Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant, calculated in accordance with Condition 6.2.19, is in excess of the limit in Condition 3.2.8.
[Toxic Guideline - 391-3-1-.02(2)(a)1]
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

Chemtall Plant

- ix. Any two consecutive readings during which the pressure drop for a baghouse associated with the Powder Plant or Drum Drying Process (Equipment Groups PP and DD) at the Chemtall Plant, except for Source Codes CP2F, CP2G, CP8D, and CP9D, measured and recorded in accordance with Condition 5.2.2.d, is less than 1.0 inch of water or greater than 10.0 inches of water.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- xxi. Any two consecutive readings during which the pressure drop for Baghouse CP2F, CP2G, CP8D or CP9D at the Chemtall Plant, measured and recorded in accordance with Condition 5.2.2.d, is less than 0.1 inch of water or greater than 10.0 inches of water.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:

Chemtall Plant

- ii. A report of the 12-month rolling totals for IPA-dispersants production in Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant as calculated per Condition 6.2.16 for each month in the reporting period.
[Avoidance of 40 CFR 52.21]
- iii. A report of the 12-month rolling totals for sulfur dioxide emissions from dispersants production in Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant as calculated per Condition 6.2.17 for each month in the reporting period.
[Avoidance of 40 CFR 52.21]

6.2 Specific Record Keeping and Reporting Requirements

Chemtall

- 6.2.14 The Permittee shall maintain monthly records of the types and amounts (in tons) of product produced in Emulsion Plant Lines 6, 7, 9, 10, 21 through 24, 27 through 29, 31, 34 through 39, and 43 through 47 (Source Codes EM6, EM7, EM9, EM10, EM21 through EM24, EM27 through EM29, EM31, EM34 through EM39, and EM43 through EM47) at the Chemtall Plant.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.2.15 The Permittee shall use the emission factor data collected in accordance with performance testing and the production records required by Condition 6.2.14 to calculate monthly acrylamide and acrylic acid emissions from Emulsion Plant Lines 6, 7, 9, 10, 21 through 24, 27 through 29, 31, 34 through 39, and 43 through 47 (Source Codes EM6, EM7, EM9, EM10, EM21 through EM24, EM27 through EM29, EM31, EM34 through EM39, and EM43 through EM47) at the Chemtall Plant. The Permittee shall use the worst-case emission factor for each product unless additional testing has been conducted to establish specific factors for a particular product. The monthly totals shall be used to calculate 12-month rolling totals to demonstrate compliance with the limits in Conditions 3.2.5, 3.2.6, and 3.2.7. For any month during which emissions exceed one twelfth of the applicable limit, the facility shall provide written notice to the Division. This written notice shall be submitted by the 30th of the month following the month that the total production exceeded the notification level. The written notification shall include the following:
[Toxic Guideline - 391-3-1-.02(2)(a)1]
 - a. The month in which the notification level was exceeded.
 - b. The total emissions for the month for the applicable pollutant.
 - c. The facility's plan to ensure that the applicable emission limit is not exceeded.

- 6.2.16 The Permittee shall record the amount of IPA-dispersants produced in Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant in tons on a monthly basis and calculate rolling 12-month total tons of IPA- dispersants production. The records shall include a notation of which line produced the IPA-dispersant. For any month during which total production exceeds 21,900 tons, the facility will provide written notice to the Division. This written notice shall be submitted by the 30th of the month following the month that the total production exceeded the 21,900 ton notification level. The written notification shall include the following:
[40 CFR 52.21 Avoidance]
- a. The month in which the total production rate exceeded 21,900 tons.
 - b. The total production rate for the month.
 - c. The facility's plans to ensure that the annual total production limit of 262,800 tons per 12 month period is not exceeded.
- 6.2.17 The Permittee shall calculate sulfur dioxide emissions from the production of dispersants in Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant on a monthly and rolling 12-month total basis. The sulfur dioxide calculations shall be based on production, engineering/mass balance data, and the removal efficiency of Scrubber CE4A/4B. For any month during which sulfur dioxide emissions exceed 3.33 tons, the facility shall provide written notice to the Division. This written notice shall be submitted by the 30th of the month following the month that the total production exceeded the 3.33 ton notification level. The written notification shall include the following:
[40 CFR 52.21 Avoidance]
- a. The month in which the sulfur dioxide emissions exceeded 3.33 tons.
 - b. The total sulfur dioxide emissions for the month.
 - c. The facility's plan to ensure that the annual sulfur dioxide emission limit of less than 40 tons per 12-month period is not exceeded.
- 6.2.18 The Permittee shall maintain monthly records of the types and amounts (in tons) of product produced in Liquid Product Lines 1 through 10 and 13 (Source Codes LQ01 through LQ10 and LQ13) at the Chemtall Plant.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

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SNF - Riceboro

Permit Amendment No.: 2899-179-0011-V-02-8

- 6.2.19 The Permittee shall use the emission factor data collected in accordance with Conditions 4.2.9 and 4.2.11 and the production records required by Condition 6.2.18 to calculate monthly acrylamide and acrylic acid emissions from Liquid Product Lines 1 through 10 (Source Codes LQ01 through LQ10) and Liquid Product Line 13 (Source Code LQ13) at the Chemtall Plant. The Permittee shall use the worst-case emission factor for each product unless additional testing has been conducted to establish specific factors for a particular product. The monthly totals shall be used to calculate 12-month rolling totals to demonstrate compliance with the limits in Conditions 3.2.8 and 3.2.12. For any month during which emissions exceed one twelfth of the applicable limit, the facility shall provide written notice to the Division. This written notice shall be submitted by the 30th of the month following the month that the total production exceeded the notification level. The written notification shall include the following:
[Toxic Guideline - 391-3-1-.02(2)(a)1]
- a. The month in which the notification level was exceeded.
 - b. The total emissions for the month for the applicable pollutant.
 - c. The facility's plan to ensure that the applicable emission limit is not exceeded.
- 6.2.21 The Permittee shall furnish the Division written notification as follows for the operations at the Chemtall Plant. For the purpose of this Permit, "startup" shall mean the setting in operation of a source for its intended purpose.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. The actual date of the initial startup of Emulsion Plant Lines 46 and 47 (Source Codes EM46 and EM47) with Scrubber SE3A/B and Liquids Product Line 13 (Source Code LQ13) with Scrubbers CE6 and CE7, within 15 days after such date.
 - b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the application for the equipment.
- 6.2.72 The Permittee shall submit to the Division a notification of the actual date of the initial startup of replacement Baghouses CP8D and CP9D. This notification shall be postmarked within 15 days of the actual startup date.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **SNF – Riceboro**

City: Riceboro

County: Liberty

AIRS No.: 04-13-179-00011

Application No.: 20759

Date Title V Applications Received: October 14, 2011

Permit No.: 2899-179-0011-V-02-7

Program	Review Engineers	Review Managers
SSPP	Casie Britton	David Matos
SSCP	N/A	N/A
ISMP	N/A	N/A
TOXICS	N/A	N/A
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2899-179-0011-V-02-0	March 12, 2010	X	
2899-179-0011-V-02-1	June 7, 2010	X	
2899-179-0011-V-02-2	November 1, 2010	X	
2899-179-0011-V-02-3	November 15, 2010	X	
2899-179-0011-V-02-4	February 24, 2011	X	
2899-179-0011-V-02-5	May 13, 2011	X	
2899-179-0011-V-02-6	DRAFT	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2899-179-0011-V-02-0	Renewal Title V Permit
2899-179-0011-V-02-1	502(b)(10) for miscellaneous pneumatic conveyance lines, product transfer storage bins, and truck loading equipment with dust collectors.
2899-179-0011-V-02-2	502(b)(10) for a new continuous acrylates plant, two new boilers, and inclusion of MON for the existing continuous acrylates plant.
2899-179-0011-V-02-3	502(b)(10) for a new continuous chloromethylation line with thermal oxidizer, and an increase in production for two existing chloromethylation lines.
2899-179-0011-V-02-4	Significant Modification issued for the revision of toxic impact assessment limits for Powder Plant Line P11 and Chemtall Stack SE19, the construction of small dust collectors at Powder Plant Lines P9, P10, and P11, the construction of drum dryers DD5 and DD6, and the revision of excursion values for Baghouses CP2F and CP2G.
2899-179-0011-V-02-5	Significant modification the revision of an acrylic acid limit.
2899-179-0011-V-02-6	Minor modification for the replacement of bag-type filter Baghouses CP8C and CP9C with cartridge-type filter baghouses.

II. Proposed Modification

A. Description of Modification

Template Conditions 6.1.3, 6.1.4 and 8.14.1 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

III. Other Record Keeping and Reporting Requirements

Template Conditions 6.1.3 and 6.1.4 were updated in September 2011 to allow ~60 days to submit periodic reports. Alternative reporting deadlines are allowed per 40 CFR 70.6, 40 CFR 60.19(f) and 40 CFR 63.10(a).

The existing reporting deadlines in Conditions 6.2.6, 6.2.10, 6.2.24, and 6.2.54 were consistent with the updated deadlines and, therefore, were not changed.

IV. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Addendum to Narrative

The 45-day EPA review started on November 3, 2011, and ended on December 19, 2011. Comments were not received by the Division.

Part 70 Operating Permit Amendment

Permit Amendment No.: 2899-179-0011-V-02-7 Effective Date: January 19, 2012

Facility Name: SNF – Riceboro

Facility Address Chemical Plant Road
Riceboro, Georgia 31323, Liberty County

Mailing Address: P.O. Box 250
Riceboro, GA 31323

Parent/Holding Company: SNF Holding Corporation

Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Revision of the periodic reporting deadlines in Conditions 6.1.3, 6.1.4, and 8.14.1.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2899-179-0011-V-02-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit No. 2899-179-0011-V-02-0.

This Permit Amendment may be subject to revocation, suspension, modification, or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-20759, dated October 12, 2011; any other applications upon which this Permit Amendment or Permit No. 2899-179-0011-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 3 pages.

[Signed]

Director
Environmental Protection Division

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PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. **The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period,** and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each semiannual period ending June 30 and December 31 of each year. **All reports shall be postmarked by August 29 and February 28, respectively following each reporting period.** In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.
- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.

Title V Permit Amendment

SNF – Riceboro

Permit Amendment No.: 2899-179-0011-V-02-7

- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

PART 8.0 GENERAL PROVISIONS**8.14 Compliance Requirements****8.14.1 Compliance Certification**

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and
- e. Any additional requirements specified by the Division.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **SNF – Riceboro**

City: Riceboro

County: Liberty

AIRS #: 04-13-179-00011

Application #: 20936

Date SIP Application Received: N/a

Date Title V Application Received: January 17, 2012

Permit No: 2899-179-0011-V-02-9

Program	Review Engineers	Review Managers
SSPP	Heather Cottrell	David Matos
SSCP	Farhana Yasmin	Douglas Waldron
ISMP	Marcus Cureton	Richard Taylor
TOXICS	N/a	N/a
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW**I. Facility Description****A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2899-179-0011-V-02-0	March 12, 2010	X	
2899-179-0011-V-02-1	June 7, 2010	X	
2899-179-0011-V-02-2	November 1, 2010	X	
2899-179-0011-V-02-3	November 15, 2010	X	
2899-179-0011-V-02-4	February 24, 2011	X	
2899-179-0011-V-02-5	May 13, 2011	X	
2899-179-0011-V-02-6	November 10, 2011	X	
2899-179-0011-V-02-7	January 19, 2012	X	
2899-179-0011-V-02-8	Pending	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2899-179-0011-V-02-0	Renewal permit.
2899-179-0011-V-02-1	502(b)(10) for miscellaneous pneumatic conveyance lines, product transfer storage bins, and truck loading equipment with dust collectors.
2899-179-0011-V-02-2	502(b)(10) for a new continuous acrylates plant, two new boilers, and inclusion of MON for the existing continuous acrylates plant.
2899-179-0011-V-02-3	502(b)(10) for a new continuous chloromethylation line with thermal oxidizer, and an increase in production for two existing chloromethylation lines.
2899-179-0011-V-02-4	Significant modification issued for the revision of toxic impact assessment limits for Powder Plant Line P11 and Chemtall Stack SE19, the construction of small dust collectors at Powder Plant Lines P9, P10, and P11, the construction of drum dryers DD5 and DD6, and the revision of excursion values for Baghouses CP2F and CP2G.
2899-179-0011-V-02-5	Significant modification the revision of an acrylic acid limit.
2899-179-0011-V-02-6	Minor modification for the replacement of Baghouses CP8C and CP9C.
2899-179-0011-V-02-7	Minor modification for the revision of the periodic reporting deadlines in Conditions 6.1.3, 6.1.4, and 8.14.1.
2899-179-0011-V-02-8	Minor modification for changing Liquid Product Lines LQ11 and LQ12 to Emulsion Plant Lines EM46 and EM47 to vent to Scrubber SE3A/B and changing the source codes for Powder Plant P8 and P9 fines dryer baghouses.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

B. Regulatory Status

1. PSD/NSR/RACT

The facility is classified as a major source under PSD regulations. The facility has taken the following limits to avoid PSD review:

- The production of IPA-dispersants in Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) is limited to 262,800 tons per consecutive twelve-month period.
- Scrubber CE4A/4B must reduce inlet emissions of sulfur dioxide by at least 96 percent.
- The emissions of sulfur dioxide from Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) must not equal or exceed 40 tons during any consecutive twelve-month period.
- The production of IPA-dispersants in Liquids Product Line 13 (Source Code LQ13) is prohibited.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓	✓		
CO	✓	✓		
TRS				
H ₂ S				
Individual HAP	✓	✓		
Total HAPs	✓	✓		

II. Proposed Modification

A. Description of Modification

The application is a request for a revision to the allowable pressure drop operating range listed in the permit for Drum Dryer Dust Collectors CDD5 and CDD6. The units were originally permitted as bag filter-type collectors; however, the collectors that were installed contain cartridge-type filters. The current permit lists the range as 1.0 to 10.0 inches of water. The new range will be 0.1 to 10.0 inches of water as the facility expects the typical operating range to be 0.3 to 0.5 inches of water.

B. Emissions Change

There are no emission changes associated with this modification.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	0	0
PM ₁₀	Yes	0	0
SO ₂	No	--	--
VOC	No	--	--
NO _x	No	--	--
CO	No	--	--
TRS	No	--	--
H ₂ S	No	--	--
Individual HAP	No	--	--
Total HAPs	No	--	--

C. PSD/NSR Applicability

This modification is not subject to review under PSD/NSR.

III. Facility Wide Requirements

- A. Emission and Operating Caps – There are no facility wide changes associated with this modification.
- B. Applicable Rules and Regulations – There are no facility wide changes associated with this modification.
- C. Compliance Status – Not Applicable.
- D. Operational Flexibility – There are no operational flexibility issues associated with this modification.
- E. Permit Conditions – There are no facility wide changes associated with this modification.

IV. Regulated Equipment Requirements**A. Brief Process Description**

Please see Part 1.0 of Air Quality Permit No. 2899-179-0011-V-02-0 for a complete process description.

B. Equipment List for the Process

There are no equipment list changes associated with this modification.

C. Equipment & Rule Applicability

There are no equipment or rule applicability changes associated with this modification.

D. Compliance Status

The facility has indicated compliance with all applicable rules and regulations.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

E. Operational Flexibility

There are no operational flexibility issues associated with this modification.

F. Permit Conditions

There are no condition changes for Part 3.0 of the permit.

V. Testing Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment: There are no testing requirements associated with this modification.

B. Equipment Groups (all subject to the same test requirements): There are no testing requirements associated with this modification.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment: There are no monitoring requirement changes associated with this modification.

B. Equipment Groups (all subject to the same monitoring requirements): There are no monitoring requirements changes associated with this modification.

VI. Other Record Keeping and Reporting Requirements

Conditions 6.1.7.c.ix and 6.1.7.c.xxi have been modified to move Source Codes CDD5 and CDD6 to the excursion condition that allows a pressure drop range of 0.1 to 10.0 inches of water.

VII. Specific Requirements

A. Operational Flexibility – Not Applicable.

B. Alternative Requirements – Not Applicable.

C. Insignificant Activities – Not Applicable.

D. Temporary Sources – Not Applicable.

E. Short-Term Activities – Not Applicable.

F. Compliance Schedule/Progress Reports – Not Applicable.

G. Emissions Trading – Not Applicable.

H. Acid Rain Requirements – Not Applicable.

I. Prevention of Accidental Releases – This modification does not change the source's applicability.

J. Stratospheric Ozone Protection Requirements – This modification does not change the source's applicability.

K. Pollution Prevention – Not Applicable.

L. Specific Conditions – Not Applicable.

Addendum to Narrative

The 45-day EPA review started on March 1, 2012 and ended on April 16, 2012. Comments were not received by the Division.

Part 70 Operating Permit Amendment

Permit Amendment No.: 2899-179-0011-V-02-9 Effective Date: April 26, 2012

Facility Name: SNF – Riceboro

Facility Address: Chemical Plant Road
Riceboro, Georgia 31323, Liberty County

Mailing Address: P.O. Box 250
Riceboro, Georgia 31323

Parent/Holding Company: SNF Holding Corporation

Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Revision of the allowable pressure drop operating range for Drum Dryer Dust Collectors CDD5 and CDD6.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2899-179-0011-V-02-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit No. 2899-179-0011-V-02-0.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-20936 dated January 13, 2012; any other applications upon which this Permit Amendment or Permit No. 2899-179-0011-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 2 pages.

[Signed]

Director
Environmental Protection Division

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PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS.....2

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

The modification is a revision to the allowable pressure drop operating range listed in the permit for Drum Dryer Dust Collectors CDD5 and CDD6.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
- ix. Any two consecutive readings during which the pressure drop for a baghouse associated with the Powder Plant or Drum Drying Process (Equipment Groups PP and DD) at the Chemtall Plant, except for Source Codes CP2F, CP2G, CP8C, CP9C, CDD5, and CDD6, measured and recorded in accordance with Condition 5.2.2.d, is less than 1.0 inch of water or greater than 10.0 inches of water.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- xxi. Any two consecutive readings during which the pressure drop for Baghouse CP2F, CP2G, CP8C, CP9C, CDD5, or CDD6 at the Chemtall Plant, measured and recorded in accordance with Condition 5.2.2.d, is less than 0.1 inch of water or greater than 10.0 inches of water.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **SNF – Riceboro**

City: Riceboro

County: Liberty

AIRS #: 04-13-179-00011

Application #: 21141

Date SIP Application Received: May 2, 2012

Date Title V Application Received: May 2, 2012

Permit No: 2899-179-0011-V-02-A

Program	Review Engineers	Review Managers
SSPP	Heather Cottrell	David Matos
SSCP	Farhana Yasmin	Douglas Waldron
ISMP	Marcus Cureton	Richard Taylor
TOXICS	Sherry Waldron	Michael Odom
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments and minor and significant modifications and 502(b)(10) changes. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
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2899-179-0011-V-02-1	June 7, 2010	X	
2899-179-0011-V-02-2	November 1, 2010	X	
2899-179-0011-V-02-3	November 15, 2010	X	
2899-179-0011-V-02-4	February 24, 2011	X	
2899-179-0011-V-02-5	May 13, 2011	X	
2899-179-0011-V-02-6	November 10, 2011	X	
2899-179-0011-V-02-7	January 19, 2012	X	
2899-179-0011-V-02-8	April 17, 2012	X	
2899-179-0011-V-02-9	April 26, 2012	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2899-179-0011-V-02-0	Renewal permit.
2899-179-0011-V-02-1	502(b)(10) for miscellaneous pneumatic conveyance lines, product transfer storage bins, and truck loading equipment with dust collectors.
2899-179-0011-V-02-2	502(b)(10) for a new continuous acrylates plant, two new boilers, and inclusion of MON for the existing continuous acrylates plant.
2899-179-0011-V-02-3	502(b)(10) for a new continuous chloromethylation line with thermal oxidizer, and an increase in production for two existing chloromethylation lines.
2899-179-0011-V-02-4	Significant modification issued for the revision of toxic impact assessment limits for Powder Plant Line P11 and Chemtall Stack SE19, the construction of small dust collectors at Powder Plant Lines P9, P10, and P11, the construction of drum dryers DD5 and DD6, and the revision of excursion values for Baghouses CP2F and CP2G.
2899-179-0011-V-02-5	Significant modification the revision of an acrylic acid limit.
2899-179-0011-V-02-6	Minor modification for the replacement of Baghouses CP8C and CP9C.
2899-179-0011-V-02-7	Minor modification for the revision of the periodic reporting deadlines in Conditions 6.1.3, 6.1.4, and 8.14.1.
2899-179-0011-V-02-8	Minor modification for changing Liquid Product Lines LQ11 and LQ12 to Emulsion Plant Lines EM46 and EM47 to vent to Scrubber SE3A/B and changing the source codes for Powder Plant P8 and P9 fines dryer baghouses.
2899-179-0011-V-02-9	Minor modification for the revision of the allowable pressure drop operating range for Drum Dryer Dust Collectors CDD5 and CDD6.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

B. Regulatory Status

1. PSD/NSR/RACT

The facility is classified as a major source under PSD regulations. The facility has taken the following limits to avoid PSD review:

- The production of IPA-dispersants in Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) is limited to 262,800 tons per consecutive twelve-month period.
- Scrubber CE4A/4B must reduce inlet emissions of sulfur dioxide by at least 96 percent.
- The emissions of sulfur dioxide from Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) must not equal or exceed 40 tons during any consecutive twelve-month period.
- The production of IPA-dispersants in Liquids Product Line 13 (Source Code LQ13) is prohibited.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓	✓		
CO	✓	✓		
TRS				
H ₂ S				
Individual HAP	✓	✓		
Total HAPs	✓	✓		
Total GHGs	✓			✓

II. Proposed Modification

A. Description of Modification

SNF – Riceboro is permitted to install a batch chemical production line designated as Liquids Product Line 13 (Source Code LQ13) with associated scrubbers and support equipment. The line has not yet been installed. The facility plans to proceed with the project with the following changes:

- In the original application, a pre-made base was used to manufacture Product F. The updated process includes the emission calculations for synthesizing the base on site.
- Choline chloride will no longer be used as a raw material; therefore, there will be no chlorine emission associated with Product F.
- The batch size for Product F has been increased.
- Due to changes in product formulation, hydrochloric acid (HCl) emissions from the process, which were previously considered to be negligible, were estimated in the application.
- The line was previous permitted to use two packed bed scrubbers (Source Codes CE6 and CE7). The plan has been revised to include a packed bed scrubber (Source Code CE6) to control HCl emissions and a two-stage packed bed scrubber (Source Code CE7A/B) to control sodium hypochlorite, acrylamide, and acrylic acid emissions.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

The application also requests inclusion of emissions from an off-permit change approved on April 18, 2012. The off-permit change was for the installation and operation of two HCl tanks (Source Code HC02 and HC03). The tanks are equipped with a scrubber (Source Code CHCL) and service Liquids Product Line 13.

B. Emissions Change

SNF used engineering calculations and EPA Tanks software to calculate the emissions increase for the Liquids Lines from the changes discussed above. The emissions increases from the process changes are negligible at $2.14\text{E-}6$ tpy of acrylamide and $2.65\text{E-}4$ of HCl. The potential HCl emissions from the storage tanks are reduced by 0.13 tpy due to the use of the scrubber.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM			
PM ₁₀			
PM _{2.5}			
SO ₂			
VOC	Yes	0	0
NO _x			
CO			
TRS			
H ₂ S			
Individual HAP	Yes	(0.13)	(0.13)
Total HAPs	Yes	(0.13)	(0.13)
Total GHGs			

C. PSD/NSR Applicability

The changes proposed by the facility are not subject to PSD. The total potential emissions from Liquids Product Line 13 and the HCl tanks are significantly less than the PSD thresholds.

III. Facility Wide Requirements

- A. Emission and Operating Caps – Not applicable.
- B. Applicable Rules and Regulations – Not applicable.
- C. Compliance Status – Not applicable.
- D. Operational Flexibility – Not applicable.
- E. Permit Conditions – Not applicable.

IV. Regulated Equipment Requirements

A. Brief Process Description

The Liquids Product Lines are capable of producing emulsion polymers, solution polymers, dispersants (processed with either water or isopropanol), dry strength polymers, and wet strength polymers. A typical production line includes a reactor with associated weigh/mix tanks and a dissolution tank. In addition, some dissolution tanks may be shared between reactors and/or dissolution will sometimes be completed directly in the reactor. The facility uses scrubbers to control emissions from the liquids product lines.

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CHEMTALL					
LQ – Liquids Product Lines					
LQ13	Liquids Product Line 13	40 CFR 63 Subpart FFFF ² 391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.12, 3.2.13, 3.3.23, 3.3.57, 3.3.65, 3.4.3, 3.4.4, 4.2.11, 4.2.12, 5.2.2, 6.1.7, 6.2.18, 6.2.19, 6.2.21, and 6.2.23 through 6.2.25*	CE6 CE7A CE7B	Packed-Bed Scrubbers Two-Stage Packed-Bed Scrubber
Other					
HC01	Hydrochloric Acid Tank	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.12, and 6.2.23 through 6.2.25*	None	None
HC02 HC03	Hydrochloric Acid Tanks	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.12, and 6.2.23 through 6.2.25*	CHCL	Venturi/Packed Bed Scrubber

*Generally applicable requirements for all units.

*Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

¹Group 1 Source; ²Group 2 Source.

C. Equipment & Rule Applicability

The changes proposed in the application do not change the rule applicability for Liquids Product Line 13 and the HCl tanks. The equipment continues to be classified as Group 2 sources under 40 CFR 63 Subpart FFFF. No controls are required for Group 2 sources.

D. Compliance Status – Not applicable.

E. Operational Flexibility- Not applicable.

F. Permit Conditions

Condition 3.2.12 has been modified to revise the allowable emissions of acrylamide from Liquids Products Line 13 from 0.098 pounds per year to 0.103 pounds per year. The last facility wide TIA for acrylamide was conducted in 2006. The annual MCLC was determined to be 0.04 ug/m3 compared to an annual ACC of 0.10 ug/m3. It is not expected that this negligible increase will cause the MCLC to equal or exceed the ACC.

V. Testing Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment: Condition 4.2.11 has been modified to revise the scrubber reference for acrylamide and acrylic acid testing for Liquids Product Line 13.

B. Equipment Groups (all subject to the same test requirements): Not applicable.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

A. Individual Equipment:

Condition 5.2.2.e has been modified to add reference to Scrubber CE7A/B.

Condition 5.2.2.f has been modified to remove reference to Scrubbers CE6 and CE7.

Condition 5.2.2.i has been added to the permit to include the updated monitoring requirements for Scrubber CE6 and the requirements for Scrubber CHCL.

- B. Equipment Groups (all subject to the same monitoring requirements): Not applicable.

VI. Other Record Keeping and Reporting Requirements

Condition 6.1.7.c.xv has been modified to revise the excursion reporting requirements for Scrubber CE6.

Condition 6.1.7.c.xvi has been modified to remove the excursion reporting requirements for Scrubber CE7 and to add the requirements for Scrubber CE7A/B.

Condition 6.1.7.c.xxii has been added to the permit. The condition specifies the excursion reporting requirements for Scrubber CHCL.

Condition 6.2.21 has been modified to remove reference to Scrubber CE7 and to add reference to Scrubber CE7A/B.

VII. Specific Requirements

- A. Operational Flexibility – Not applicable.
- B. Alternative Requirements – Not applicable.
- C. Insignificant Activities – Not applicable.
- D. Temporary Sources – Not applicable.
- E. Short-Term Activities – Not applicable.
- F. Compliance Schedule/Progress Reports – Not applicable.
- G. Emissions Trading – Not applicable.
- H. Acid Rain Requirements – Not applicable.
- I. Prevention of Accidental Releases – This amendment does not change the source's applicability.
- J. Stratospheric Ozone Protection Requirements – This amendment does not change the source's applicability.
- K. Pollution Prevention – Not applicable.
- L. Specific Conditions – Not applicable.

Addendum to Narrative

The 45-day EPA review started on July 5, 2012 and ended on August 20, 2012. Comments were not received by the Division.

Part 70 Operating Permit Amendment

Permit Amendment No.: 2899-179-0011-V-02-A Effective Date: August 29, 2012

Facility Name: SNF – Riceboro

Facility Address Chemical Plant Road
Riceboro, Georgia 31323, Liberty County

Mailing Address: P.O. Box 250
Riceboro, Georgia 31323

Parent/Holding Company: SNF Holding Corporation

Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

The revision of the control plan for the Liquids Product Line 13 (Source Code LQ13) from two single stage packed bed scrubbers (Source Codes CE6 and CE7) to a single stage scrubber (Source Code CE6) and a two-stage scrubber (Source Code CE7A/B) and changes to the manufacture of Product F in Liquids Product Line 13.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2899-179-0011-V-02-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit No. 2899-179-0011-V-02-0.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-21141 dated April 27, 2012; any other applications upon which this Permit Amendment or Permit No. 2899-179-0011-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 7 pages.

[Signed]

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

SNF – Riceboro is permitted to install a batch chemical production line designated as Liquids Product Line 13 (Source Code LQ13) with associated scrubbers and support equipment. The line has not yet been installed. The facility is changing the scrubber configuration order to accommodate process formulation changes. The plan has been revised to include a packed bed scrubber (Source Code CE6) and a two-stage packed bed scrubber (Source Code CE7A/B). The amendment also includes equipment from a previous off-permit change. This equipment includes two HCl tanks and an associated scrubber (Source Code HC02, HC03, and CHCL, respectively).

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.A Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CHEMTALL					
LQ – Liquids Product Lines					
LQ13	Liquids Product Line 13	40 CFR 63 Subpart FFFF ² 391-3-1-.02(2)(b) 391-3-1-.02(2)(c)	3.2.12, 3.2.13, 3.3.23, 3.3.57, 3.3.65, 3.4.3, 3.4.4, 4.2.11, 4.2.12, 5.2.2, 6.1.7, 6.2.18, 6.2.19, 6.2.21, and 6.2.23 through 6.2.25*	CE6 CE7A CE7B	Packed-Bed Scrubbers Two-Stage Packed-Bed Scrubber
Other					
HC01	Hydrochloric Acid Tank	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.12, and 6.2.23 through 6.2.25*	None	None
HC02 HC03	Hydrochloric Acid Tanks	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.12, and 6.2.23 through 6.2.25*	CHCL	Venturi/Packed Bed Scrubber

*Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

¹Group 1 Source; ²Group 2 Source.

3.2 Equipment Emission Caps and Operating Limits

3.2.12 The Permittee shall not discharge or cause the discharge into the atmosphere from Liquids Product Line 13 (Source Code LQ13) through Stack SE55 at the Chemtall Plant any gases which:

[Toxic Guideline - 391-3-1-.02(2)(a)1]

- Contain acrylamide in excess of 0.103 pounds during any consecutive twelve-month period.
- Contain acrylic acid in excess of 115 pounds during any consecutive twelve-month period.

PART 4.0 REQUIREMENTS FOR TESTING**4.2 Specific Testing Requirements**

- 4.2.11 Following the issuance of this permit amendment, within 60 days after achieving the maximum production rate at which the Liquids Product Line 13 (Source Code LQ13) at the Chemtall Plant will be operated, but no later than 180 days after startup, the Permittee shall conduct acrylic acid and acrylamide performance tests on Stack SE55 (Scrubber CE7A/B). The Permittee shall, at a minimum, conduct the testing while processing the worst-case product batch(es) for acrylamide and acrylic acid. The testing shall be conducted over the entire batch and the data shall be used to develop emission factors in terms of pounds of acrylamide / acrylic acid per ton of product. The Permittee may elect to test other product batches in addition to those discussed above for the purpose of obtaining data for specific product mixes. The results of the performance test shall be submitted to the Division within 60 days of the completion of testing.
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.2 Specific Monitoring Requirements**

- 5.2.2 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[a. through d. – No Changes]

- e. Pressure drop (Stages A and B combined), scrubbant flow rate, and scrubbant pH (for each stage) for Scrubbers CE4A/B, CE7A/B, and SE3A/B at the Chemtall Plant. Data shall be recorded once per shift.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- f. Pressure drop, scrubbant flow rate, and scrubbant pH for Scrubbers CE5, SC1, and SC2 at the Chemtall Plant. Data shall be recorded once per shift.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[g. and h. – No Changes]

- i. Scrubbant flow rate and scrubbant pH for Scrubbers CE6 and CHCL at the Chemtall Plant. Data shall be recorded once per shift.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

xv. Any three consecutive readings during which an operating parameter for Scrubber CE6 at the Chemtall Plant, measured and recorded in accordance with Condition 5.2.2.i, is outside the following range of values or values determined through subsequent performance testing:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

(A) Minimum Scrubbant pH: 6.0.

(B) Minimum Scrubbant flow rate: 19 gpm.

xvi. Any three consecutive readings during which an operating parameter for Scrubber CE7A/B at the Chemtall Plant, measured and recorded in accordance with Condition 5.2.2.e, is outside the following range of values or values determined through subsequent performance testing:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

(A) Minimum Scrubbant pH (Stage A): 5.0.

(B) Scrubbant pH (Stage B): 1.0 to 9.0.

(C) Pressure drop (Stages A and B combined): 1.0 to 9.0 inches of water.

(D) Minimum Scrubbant flow rate (to each of Stages A and B): 19 gpm.

xxii. Any three consecutive readings during which an operating parameter for Scrubber CHCL at the Chemtall Plant, measured and recorded in accordance with Condition 5.2.2.i, is outside the following range of values or values determined through subsequent performance testing:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

(A) Minimum Scrubbant pH (packed bed section): 6.0.

(B) Minimum Scrubbant flow rate (educator-venturi section): 63 gpm.

(C) Minimum Scrubbant flow rate (packed bed section): 19 gpm.

6.2 Specific Record Keeping and Reporting Requirements

- 6.2.21 The Permittee shall furnish the Division written notification as follows for the operations at the Chemtall Plant. For the purpose of this Permit, “startup” shall mean the setting in operation of a source for its intended purpose.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- a. The actual date of the initial startup of Emulsion Plant Lines 46 and 47 (Source Codes EM46 and EM47) with Scrubber SE3A/B and Liquids Product Line 13 (Source Code LQ13) with Scrubbers CE6 and CE7A/B, within 15 days after such date.
 - b. Certification that a final inspection has shown that construction has been completed in accordance with the application, plans, specifications, and supporting documents submitted in support of the application for the equipment.

PART 7.0 OTHER SPECIFIC REQUIREMENTS**7.2 Off-Permit Changes Associated with this Modification**

This permitting action incorporates the following Off-Permit Change:

- a. April 18, 2012: Off-Permit Change for the installation and operation of two 42,267-gallon HCl tanks (Source Codes HC02 and HC03) equipped with a scrubber (Source Code CHCL) to service Source Code LQ13.

Facility Name: **SNF – Riceboro**

City: Riceboro

County: Liberty

AIRS #: 04-13-17900011

Application #: 21710

Date SIP Application Received: February 13, 2013; Revised April 2013, June 2013, and August 2013

Date Title V Application Received: February 13, 2013; Revised April 2013, June 2013, and August 2013

Permit No: 2899-179-0011-V-02-B

Program	Review Engineers	Review Managers
SSPP	Heather Cottrell	David Matos
SSCP	Farhana Yasmin	Sean Taylor
ISMP	Marcus Cureton	Richard Taylor
TOXICS	Sherry Waldron	Michael Odom
Permitting Program Manager		Eric Cornwell

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments. Comments are listed in Table 2 below.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Comments	
		Yes	No
2899-179-0011-V-02-0	March 12, 2010	X	
2899-179-0011-V-02-1	June 7, 2010	X	
2899-179-0011-V-02-2	November 1, 2010	X	
2899-179-0011-V-02-3	November 15, 2010	X	
2899-179-0011-V-02-4	February 24, 2011	X	
2899-179-0011-V-02-5	May 13, 2011	X	
2899-179-0011-V-02-6	November 10, 2011	X	
2899-179-0011-V-02-7	January 19, 2012	X	
2899-179-0011-V-02-8	April 17, 2012	X	
2899-179-0011-V-02-9	April 26, 2012	X	
2899-179-0011-V-02-A	August 29, 2012	X	

Table 2: Comments on Specific Permits

Permit Number	Comments
2899-179-0011-V-02-0	Renewal permit.
2899-179-0011-V-02-1	502(b)(10) for miscellaneous pneumatic conveyance lines, product transfer storage bins, and truck loading equipment with dust collectors.
2899-179-0011-V-02-2	502(b)(10) for a new continuous acrylates plant, two new boilers, and inclusion of MON for the existing continuous acrylates plant.
2899-179-0011-V-02-3	502(b)(10) for a new continuous chloromethylation line with thermal oxidizer, and an increase in production for two existing chloromethylation lines.
2899-179-0011-V-02-4	Significant modification issued for the revision of toxic impact assessment limits for Powder Plant Line P11 and Chemtall Stack SE19, the construction of small dust collectors at Powder Plant Lines P9, P10, and P11, the construction of drum dryers DD5 and DD6, and the revision of excursion values for Baghouses CP2F and CP2G.
2899-179-0011-V-02-5	Significant modification for the revision of an acrylic acid limit.
2899-179-0011-V-02-6	Minor modification for the replacement of Baghouses CP8C and CP9C.
2899-179-0011-V-02-7	Minor modification for the revision of the periodic reporting deadlines in Conditions 6.1.3, 6.1.4, and 8.14.1.
2899-179-0011-V-02-8	Minor modification for changing Liquid Product Lines LQ11 and LQ12 to Emulsion Plant Lines EM46 and EM47 to vent to Scrubber SE3A/B and changing the source codes for Powder Plant P8 and P9 fines dryer baghouses.
2899-179-0011-V-02-9	Minor modification for the revision of the allowable pressure drop operating range for Drum Dryer Dust Collectors CDD5 and CDD6.
2899-179-0011-V-02-A	Minor modification for the revision of the control plan for the Liquids Product Line LQ13 from Scrubbers CE6 and CE7 to Scrubbers CE6 and CE7A/B) and changes to the manufacture of Product F in Liquids Product Line LQ13.

B. Regulatory Status

1. PSD/NSR/RACT

The facility is classified as a major source under PSD regulations. The facility has taken the following limits to avoid PSD review:

- The production of IPA-dispersants in Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) is limited to 262,800 tons per consecutive twelve-month period.
- Scrubber CE4A/4B must reduce inlet emissions of sulfur dioxide by at least 96 percent.
- The emissions of sulfur dioxide from Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) must not equal or exceed 40 tons during any consecutive twelve-month period.
- The production of IPA-dispersants in Liquids Product Line 13 (Source Code LQ13) is prohibited.

2. Title V Major Source Status by Pollutant

Table 3: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓	✓		
CO	✓	✓		
TRS				
H ₂ S				
Individual HAP	✓	✓		
Total HAPs	✓	✓		
Total GHGs	✓			✓

II. Proposed Modification

A. Description of Modification

SNF – Riceboro currently operates two (primary and backup) Incinerator/Scrubber Systems (Source Codes CMI1/CMS1 and CMI2/CMS2) at the Chloromethylation Plant to comply with 40 CFR 63 Subpart FFFF. The facility is also permitted to install a third system (Source Codes CMI3/CMS3). The plant has proposed to replace the systems with a Cryogenic Condenser Recovery Unit (Source Code CC01), which is also a compliance option under 40 CFR 63 Subpart FFFF. The change will result in a reduction of water usage, the elimination of the scrubber water discharge stream, and the recovery of methyl chloride for reuse in the process. The recovery of methyl chloride will also reduce the rail traffic at the site. The plant will retain at least one of the existing Incinerator/Scrubber Systems (Source Codes CMI1/CMS1 or CMI2/CMS2) as an offline backup for the transition to the new recovery unit.

B. Emissions Change

Methyl chloride is the primary pollutant emitted from the chloromethylation process and is a regulated pollutant under 40 CFR 63 Subpart FFFF. Methyl chloride is classified as a HAP and a VOC. There will be an increase of methyl chloride emissions due to the efficiency difference between the destruction capability of the incinerators (99+%) and the recovery capability of the cryogenic condenser (~95%). There will be a slight decrease in potential emissions of PM, NO_x, CO, SO₂, HCl and chlorine due to the combustion of natural gas when the thermal oxidizer is not in use. The combustion emission changes have not been included in this table because the thermal oxidizer/scrubber system(s) will remain in the permit as a backup control system.

The facility conducted and passed a toxic impact assessment for methyl chloride emissions. The results were reviewed by the Division.

Table 4: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	Yes	--	0
PM ₁₀	Yes	--	0
PM _{2.5}	Yes	--	0
SO ₂	Yes	--	0
VOC	Yes	--	39.2
NO _x	Yes	--	0
CO	Yes	--	0
TRS	No	--	--
H ₂ S	No	--	--
Individual HAP	Yes	--	41.1*
Total HAPs	Yes	--	41.1*
Total GHGs	Yes	--	0

*The emission changes were calculated using the conservative assumption that all fugitives are VOC only, which results in slightly higher HAP emissions increases.

C. PSD/NSR Applicability

The changes proposed by the facility do not trigger PSD. The facility has proposed a PSD avoidance limit for VOC emissions from the Chloromethylation Lines such that future potential emissions minus past actual emissions is 39.8 tpy (41.5 tpy minus 1.66 tpy). This is less than the PSD threshold of 40 tpy. The past actual emissions are based on production from 2011 through 2012.

III. Facility Wide Requirements

- A. Emission and Operating Caps: There are no facility wide emission or operating cap changes associated with this project.
- B. Applicable Rules and Regulations: There are no facility wide rule or regulation changes associated with this project.
- C. Compliance Status: There are no facility wide compliance issues associated with this project.
- D. Operational Flexibility: There are no facility wide operational flexibility requests associated with this project.
- E. Permit Conditions: There are no facility wide permit condition changes associated with this project.

IV. Regulated Equipment Requirements

A. Brief Process Description

Please see the narrative for Permit No. 2899-179-0011-V-02-0 for a description of the Chloromethylation Plant.

B. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CHEMTALL PLANT					
CM –Chloromethylation Plant					
CM1 CM2	Chloromethylation Lines 1 and 2 (Batch)	40 CFR 63 Subpart FFFF ¹ 391-3-1-.02(2)(b) 391-3-1-.02(2)(c)	3.2.14, 3.3.20, 3.3.21, 3.3.23, 3.3.24, 3.3.28, 3.3.57, 3.3.65, 3.3.105, 3.4.3 3.4.4, 3.5.1, 4.2.2, 4.2.13, 5.2.1, 5.2.2, 5.2.6, 5.2.7, 6.1.7, 6.2.20, 6.2.23 through 6.2.25, 6.2.28 through 6.2.32, 6.2.69, and 6.2.73 through 6.2.75*	CC01 CM12 CMS2 CM11 CMS1	Cryogenic Condenser Recovery Unit Incinerator** Scrubber** Incinerator** Scrubber**
CM3	Chloromethylation Line 3 (Batch)	40 CFR 63 Subpart FFFF ² 391-3-1-.02(2)(b) 391-3-1-.02(2)(c)	3.2.14, 3.3.23, 3.3.57, 3.3.65, 3.4.3, 3.4.4, 6.1.7, 6.2.23 through 6.2.25, and 6.2.74*	None	None
CM6 CM7 CM8	Chloromethylation Lines 6, 7, and 8 (Continuous)	40 CFR 63 Subpart FFFF ¹ 391-3-1-.02(2)(b) 391-3-1-.02(2)(c)	3.2.14, 3.3.20, 3.3.21, 3.3.23, 3.3.24, 3.3.28, 3.3.57, 3.3.65, 3.3.105, 3.4.3, 3.4.4, 3.5.1, 4.2.2, 4.2.13, 5.2.1, 5.2.2, 5.2.6, 5.2.7, 6.1.7, 6.2.20, 6.2.23 through 6.2.25, 6.2.28 through 6.2.32, 6.2.69, 6.2.70, and 6.2.73 through 6.2.75*	CC01 CM12 CMS2 CM11 CMS1	Cryogenic Condenser Recovery Unit Incinerator** Scrubber** Incinerator** Scrubber**

*Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

**Offline backup to the Cryogenic Condenser Recovery Unit.

¹Group 1 Source; ² Group 2 Source

C. Equipment & Rule Applicability

The Chloromethylation Lines are subject to 40 CFR 63 Subpart FFFF. Currently, the emissions from the installed lines are directed to an Incinerator/Scrubber System (Source Codes CM11/CMS1 or CM12/CMS2). The facility must use an incinerator to reduce uncontrolled organic HAP by at least 98% or to an outlet concentration of no more than 20 ppm. Additionally, the facility must use the scrubber to reduce the halogen HAP by at least 99%, to no more than 0.45 kg/hr, or to a concentration of no more than 20 ppm.

Following the installation of the Cryogenic Condenser Recovery Unit (Source Code CC01), the facility will comply with 40 CFR 63 Subpart FFFF by reducing uncontrolled organic HAP by at least 95% by venting emissions to a recovery device. There are no additional halogen HAP requirements when using the recovery device. The Cryogenic Condenser Recovery Unit is equipped with a small process tank that receives condensed methyl chloride. The tank vent is routed back to the recovery unit and is classified as a Group 1 batch vent.

Chloromethylation Line 3 (Source Code CM3) is not required to be controlled because the vent does not meet the definition of a Group 1 vent.

Note: The Chloromethylation Plant consists of both Group 1 batch vents and Group 1 continuous vents. The 40 CFR 63 Subpart FFFF hierarchy states that combined batch and continuous vents must comply with the requirements for Group 1 batch vents.

Chloromethylation Lines 4 and 5 (Source Codes CM4 and CM5) have been removed from the permit. The facility has decided not to construct these sources.

D. Compliance Status

The application indicates compliance with all applicable rules and regulations.

E. Operational Flexibility

There are no operational flexibility requests associated with this project.

F. Permit Conditions

Condition 3.2.14 has been added to the permit. The condition is a PSD avoidance limit for VOC emissions from the Chloromethylation Lines.

Condition 3.3.20 has been modified to include the compliance option under 40 CFR 63 Subpart FFFF for the Cryogenic Condenser Recovery Unit (Source Code CC01). The condition now includes reference to all of the applicable Chloromethylation Lines (Line 8 was previously listed in a separate condition). Line 3 is no longer listed because the line is not a Group 1 vent under 40 CFR 63 Subpart FFFF. Lines 4 and 5 have been removed from the condition as the facility no longer plans to construct the sources. The language states that the Incinerator/Scrubber Systems (Source Codes CMI1/CMS1 or CMI2/CMS2) may be used as backup devices.

Condition 3.3.21 has been modified to include reference to all of the permitted Chloromethylation Lines that are subject to control requirements under 40 CFR 63 Subpart FFFF. Line 3 has been removed and both Incinerator/Scrubber Systems (Source Codes CMI1/CMS1 and CMI2/CMS2) have been listed as backup systems to the Cryogenic Condenser Recovery Unit. (Source Code CC01). Lines 4 and 5 have been removed from the condition as the facility no longer plans to construct the sources.

Conditions 3.3.103 and 3.3.104 have been deleted. The conditions referenced Chloromethylation Line 8 and its dedicated Incinerator/Scrubber System (Source Code CMI3/CMS3). The line reference has been moved to Conditions 3.3.20 and 3.3.21. Source Codes CMI3/CMS3 will not be installed.

Condition 3.3.105 has been added to the permit. The condition references 40 CFR 63.990 requirements, which apply to recovery devices used to comply with 40 CFR 63 Subpart FFFF.

V. **Testing Requirements (with Associated Record Keeping and Reporting)**

A. Individual Equipment:

Condition 4.2.2 has been modified to include reference to all permitted Chloromethylation Lines that are subject to control requirements under 40 CFR 63 Subpart FFFF. The condition has been updated to list the testing requirements for the Cryogenic Condenser Recovery Unit (Source Code CC01) and the existing Incinerator/Scrubber Systems (Source Codes CMI1/CMS1 and CMI2/CMS2). Lines 4 and 5 have been removed from the condition as the facility no longer plans to construct the sources.

Condition 4.2.20 and 4.2.21 have been deleted. The conditions contained separate testing requirements for Chloromethylation Line 8, as it was originally permitted to use a separate Incinerator/Scrubber System (Source Code CMI3/CMS3). The testing requirements have been consolidated into Condition 4.2.2. Source Codes CMI3/CMS3 will not be installed.

B. Equipment Groups (all subject to the same test requirements): Not Applicable.

VI. **Monitoring Requirements (with Associated Record Keeping and Reporting)**

A. Individual Equipment:

Conditions 5.2.1.e and 5.2.1.f have been modified. The conditions now note that the existing Incinerator/Scrubber System(s) (Source Codes CMI1/CMS1 and CMI2/CMS2) will be a backup for the Cryogenic Condenser Recovery Unit (Source Code CC01). The conditions contain temperature and scrubber parameter monitoring requirements.

Condition 5.2.1.g has been added to the permit to include temperature monitoring for the Cryogenic Condenser Recovery Unit (Source Code CC01). The monitoring is required by 40 CFR 63 Subpart FFFF and 40 CFR 63 Subpart SS.

Condition 5.2.2.c has been modified. The condition now notes that the existing Incinerator/Scrubber System(s) (Source Codes CMI1/CMS1 and CMI2/CMS2) will be a backup for the Cryogenic Condenser Recovery Unit (Source Code CC01). The condition contains scrubber parameter monitoring parameters.

Conditions 5.2.16 and 5.2.17 have been deleted. The conditions referred to monitoring requirements for the Incinerator/Scrubber System (Source Code CMI3/CMS3) that was originally permitted for Chloromethylation Line 8. The line and the control equipment have not yet been installed. The line will now be permitted to vent to the Cryogenic Condenser Recovery Unit (Source Code CC01) and the existing Incinerator/Scrubber System(s) (Source Codes CMI1/CMS1 and CMI2/CMS2). Source Codes CMI3/CMS3 will not be installed.

B. Equipment Groups (all subject to the same monitoring requirements): Not Applicable.

VII. Other Record Keeping and Reporting Requirements

Condition 6.1.7.b.xiii has been added to the permit. The condition describes as an exceedance any 12-month period the VOC emissions from the Chloromethylation Lines exceed the PSD avoidance limit.

Conditions 6.1.7.c.vi through 6.1.7.c.viii have been modified. The conditions now note that the existing Incinerator/Scrubber System(s) (Source Codes CMI1/CMS1 and CMI2/CMS2) will be a backup for the Cryogenic Condenser Recovery Unit (Source Code CC01). The conditions are excursion reporting requirements for incinerator temperature and scrubber operating parameters.

Condition 6.1.7.c.xxiii has been added to the permit to include temperature excursion reporting requirements for the Cryogenic Condenser Recovery Unit (Source Code CC01). The reporting is required by 40 CFR 63 Subpart FFFF.

Condition 6.1.7.d.vi has been added to the permit. The condition requires the facility to submit reports of the 12-month rolling VOC emissions from the Chloromethylation Plant Lines in order to demonstrate compliance with the PSD avoidance limit.

Condition 6.1.10 has been deleted. The condition referred to reporting requirements for the Incinerator/Scrubber System (Source Code CMI3/CMS3) that was originally permitted for Chloromethylation Line 8. The line and the control equipment have not yet been installed. The line will now be permitted to vent to the Cryogenic Condenser Recovery Unit (Source Code CC01) and the existing Incinerator/Scrubber System(s) (Source Codes CMI1/CMS1 and CMI2/CMS2). Source Codes CMI3/CMS3 will not be installed.

Condition 6.2.30 has been modified to include reference to record keeping requirements for the Cryogenic Condenser Recovery Unit (Source CC01). These are requirements of 40 CFR 63 Subpart FFFF. The new language appears in paragraph c. of the condition.

Condition 6.2.69 has been modified to remove reference to the Incinerator/Scrubber System (Source Code CMI3/CMS3) that was originally permitted for Chloromethylation Line 8. The line and the control equipment have not yet been installed. The facility will use the Cryogenic Condenser Recovery Unit (Source Code CC01) in lieu of installing Source Codes CMI3/CMS3. The condition requires the facility to provide notification upon startup of the new or modified lines.

Condition 6.2.73 has been added to the permit. The condition requires the facility to submit a startup notification for the Cryogenic Condenser Recovery Unit (Source Code CC01).

Condition 6.2.74 has been added to the permit. The condition requires the facility to calculate VOC emissions for the Chloromethylation Lines in order to demonstrate compliance with the PSD avoidance limit.

Condition 6.2.75 has been added to the permit. The condition requires the Permittee to maintain records related to switching between control devices at the Chloromethylation Plant. The records provide a reasonable assurance that the appropriate controls are in place at all times of plant operation.

VIII. Specific Requirements

- A. Operational Flexibility – Not Applicable.
- B. Alternative Requirements – Not Applicable.
- C. Insignificant Activities – Not Applicable.
- D. Temporary Sources – Not Applicable.
- E. Short-Term Activities – Not Applicable.
- F. Compliance Schedule/Progress Reports – Not Applicable.
- G. Emissions Trading – Not Applicable.
- H. Acid Rain Requirements – Not Applicable.
- I. Prevention of Accidental Releases – This project does not change the source's applicability.
- J. Stratospheric Ozone Protection Requirements – This project does not change the source's applicability.
- K. Pollution Prevention – Not Applicable.
- L. Specific Conditions – Not Applicable.

Addendum to Narrative

The 30-day public review started on November 6, 2013 and ended on December 6, 2013. Comments were not received by the Division.

Part 70 Operating Permit Amendment

Permit Amendment No.: 2899-179-0011-V-02-E Effective Date: January 21, 2015

Facility Name: SNF - Riceboro

Facility Address One Chemical Plant Road
Riceboro, Georgia 31323, Liberty County

Mailing Address: P.O. Box 250
Riceboro, Georgia 31323

Parent/Holding Company: SNF Holding Company

Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Removal of the SO₂ reduction efficiency limit for Scrubber CE4A/4B.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2899-179-0011-V-02-0. Unless modified or revoked, this Permit Amendment expires simultaneously with Part 70 Permit No. 2899-179-0011-V-02-0.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. TV-22642 dated June 4, 2014; any other applications upon which this Permit Amendment or Permit No. 2899-179-0011-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 5 pages.

[Signed]

Director
Environmental Protection Division

Title V Permit Amendment

SNF - Riceboro

Permit Amendment No.: 2899-179-0011-V-02-E

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

SNF – Riceboro has requested that the 96 percent control efficiency limit for SO₂ emissions from Scrubber CE4A/4B be removed from the permit. Performance testing has demonstrated that inlet loading to the scrubber is very low and that 96 percent control is not achievable or necessary to comply with the associated SO₂ tpy limit.

Title V Permit Amendment

SNF - Riceboro

Permit Amendment No.: 2899-179-0011-V-02-E

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.E Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
CHEMTALL PLANT					
LQ – Liquids Product Lines					
LQ01 through LQ10	Liquids Product Lines 1 – 10	40 CFR 63 Subpart FFFF ² 391-3-1-.02(2)(b) 391-3-1-.02(2)(c)	3.2.8, 3.2.9, 3.2.11, 3.3.23, 3.3.57, 3.3.65, 3.4.3, 3.4.4, 4.2.9, 4.2.10, 4.2.12, 4.2.22, 5.2.2, 6.1.7, 6.2.16 through 6.2.19, 6.2.21, and 6.2.23 through 6.2.25*	CE4A CE4B	Two-Stage Packed-Bed Scrubber

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

¹ Group 1 Source; ² Group 2 Source; ³ Group 1 Source for MMA / Group 2 Source for MA, but controlled at all times.

3.2 Equipment Emission Caps and Operating Limits

Chemtall Plant

3.2.10 Deleted.

PART 4.0 REQUIREMENTS FOR TESTING**4.2 Specific Testing Requirements****Chemtall Plant**

- 4.2.10 Following the issuance of this permit amendment, within 60 days after achieving the maximum production rate at which the Liquids Product Lines 1 through 10 (Source Codes LQ01 through LQ10) at the Chemtall Plant will be operated, but no later than 180 days after startup, the Permittee shall conduct sulfur dioxide performance tests for the inlet gas and outlet gas streams for Scrubber CE4A/4B to demonstrate compliance with Condition 3.2.11. During the test the Permittee shall establish minimum values or a range of values for pressure drop, scrubbant flow rate, and scrubbant pH for Scrubber CE4A/4B to be used in determining excursions under Condition 6.1.7.
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]

PART 8.0 GENERAL PROVISIONS

[8.1 through 8.26 – No Changes]

MODIFIED CONDITIONS**8.27 Internal Combustion Engines**

- 8.27.1 For diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005, the Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart IIII - "Standard of Performance for Stationary Compression Ignition Internal Combustion Engines." Such requirements include but are not limited to:
[40 CFR 60.4200, 391-3-1-.02(8)(b)77]
- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart IIII.
 - b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart IIII.
 - c. Conduct engine maintenance prescribed by the engine manufacturer in accordance with Subpart IIII.
 - d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart IIII. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
 - e. Maintain any records in accordance with Subpart IIII
 - f. Maintain a list of engines subject to 40 CFR 60 Subpart IIII, including the date of manufacture.[391-3-1-.02(6)(b)]
- 8.27.2 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart JJJJ - "Standard of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engines(s) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006.
[40 CFR 60.4230, 391-3-1-.02(8)(b)79]
- 8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."
- For diesel-fired emergency generator engines defined as "existing" in 40 CFR 63 Subpart ZZZZ (constructed prior to June 12, 2006 for area sources of HAP, constructed prior to June 12, 2006 for <500hp engines at major sources, and constructed prior to December 19, 2002 for >500hp engines at major sources of HAP), such requirements include but are not limited to:
[40 CFR 63.6580, 391-3-1-.02(9)(b)118]
- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart ZZZZ.
 - b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart ZZZZ.

- c. Conduct the following in accordance with Subpart ZZZZ.
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first
 - ii. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first and replace as necessary
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart ZZZZ. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- e. Maintain any records in accordance with Subpart ZZZZ
- f. Maintain a list of engines subject to 40 CFR 63 Subpart ZZZZ, including the date of manufacture.[391-3-1-.02(6)(b)]

8.28 Boilers and Process Heaters

- 8.28.1 If the facility/site is an area source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart JJJJJ - "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers."
[40 CFR 63.11193]
- 8.28.2 If the facility/site is a major source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart DDDDD - "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters."
[40 CFR 63.7480]

Part 70 Operating Permit Amendment

Permit Amendment No.: 2899-179-0011-V-02-C **Effective Date:** August 21, 2014

Facility Name: SNF – Riceboro

Facility Address: One Chemical Plant Road
Riceboro, Georgia 31323, Liberty County

Mailing Address: P.O. Box 250
Riceboro, Georgia 31323

Parent/Holding Company: SNF Holding Company

Facility AIRS Number: 04-13-179-00011

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a construction permit for:

Modification of the reactor lines at the Flocryl Acrylamide Plant, installation of the Acrylates Polymer Process, installation of Powder Plant Lines 12 and 13, installation of various storage tanks, and the decommissioning of Powder Plant Lines 1 and 2 as described in Application TV-22366.

This Permit Amendment shall also serve as a final amendment to the Part 70 Permit unless objected to by the U.S. EPA or withdrawn by the Division. The Division will issue a letter when this Operating Permit amendment is finalized.

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit Amendment and Permit No. 2899-179-0011-V-02-0. Unless modified or revoked, this Permit Amendment expires upon issuance of the next Part 70 Permit for this source.

This Permit Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in Application No. 22366 dated January 6, 2014; any other applications upon which this Permit Amendment or Permit No. 2899-179-0011-V-02-0 are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Permit Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 9 pages.

[Signed]

Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

The amendment is for the following projects:

- Modification of reactor lines to increase capacity at the Floccryl Acrylamide Plant.
- Installation and operation of the Acrylates Polymer Process.
- Installation and operation of Powder Plant Lines P12 and P13 with the shutdown of existing Powder Plant Lines P1 and P2.
- Installation and operation of several new tanks.

Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-02-C

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.C Additional and Modified Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
FLOCRYL ACRYLAMIDE PLANT					
BIOO – Flocryl Acrylamide Miscellaneous Processes					
AA95	Acrylic Acid Storage Tank	40 CFR 63 Subpart F 40 CFR 63 Subpart G ²	3.3.2, 3.3.6, 3.3.57 through 3.3.59, 6.2.1, 6.2.3, 6.2.4, and 6.2.6*	None	None
CHEMTALL PLANT					
Acrylates Polymer Process					
SF1	Acrylates Polymer Process	40 CFR 63 Subpart FFFF ² 391-3-1-.03(2)(c)	3.3.23, 3.3.57, 3.3.65, 3.5.2, 3.5.3, 4.2.12, 4.2.23, 5.2.1, 6.1.7, 6.2.23 through 6.2.25, and 6.2.77*	TOSF	Thermal Oxidizer
FAOC FFLC FFOC FPLC EPOC FRVC FVLC FVOC	Agitators Flanges Flanges Pumps Pumps Pressure Relief Devices Valves Valves	40 CFR 63 Subpart FFFF 40 CFR 63 Subpart UU	3.3.22, 3.3.23, 3.3.41 through 3.3.54, 3.3.57, 3.3.65, 4.2.15, 6.2.23 through 6.2.25, and 6.2.41 through 6.2.45*	None	None
N/a	Transfer Rack Operations for Acrylates Polymer Process	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.12, and 6.2.23 through 6.2.25*	None	None
N/a	Maintenance Wastewater	40 CFR 63 Subpart FFFF	3.3.23, 3.3.26, 3.3.57, 3.3.65, 6.2.23 through 6.2.25, and 6.2.27*	None	None
PP – Powder Plant					
P1	Powder Plant Line 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, 5.2.18, 5.2.19, and 6.1.7*	CP1A through CP1E	Baghouses
P2	Powder Plant Line 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, and 6.1.7*	CP1	Dust Collector
P12	Powder Plant Line 12	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.2.15, 3.4.3, 3.4.4, 4.2.24, 5.2.2, 5.2.4, 5.2.5, 5.6.1.7, and 6.2.78*	CP2A through CP2G	Baghouses
P13	Powder Plant Line 13	391-3-1-.02(2)(b) 391-3-1-.02(2)(c)	3.2.15, 3.4.3, 3.4.4, 4.2.24, 5.2.18, 5.2.19, 6.1.7, and 6.2.78*	C12A through C12H	Dust Collectors
			3.2.15, 3.4.3, 3.4.4, 4.2.24, 5.2.2, 5.2.4, 5.2.5, 6.1.7, and 6.2.78*	C13A through C13D	Baghouses
			3.2.15, 3.4.3, 3.4.4, 4.2.24, 5.2.18, 5.2.19, 6.1.7, and 6.2.78*	C13E through C13H	Dust Collectors
Other					
AM21	Acrylamide Storage Tank	40 CFR 63 Subpart FFFF ²	3.3.23, 3.3.57, 3.3.65, 4.2.12, and 6.2.23 through 6.2.25*	None	None

Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-02-C

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
PRTL – Rebagging and Truck Loading Activities					
PRTL	Powder Plant Rebagging and Truck Loading Activities	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	3.4.3, 3.4.4, 5.2.2, 5.2.4, 5.2.5, and 6.1.7*	CP1D CP1E CP2D CP2F CP2G CP2J	Baghouses

*Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

¹Group 1 Source; ² Group 2 Source.

3.2 Equipment Emission Caps and Operating Limits

[Conditions 3.2.1 through 3.2.14 – No Changes]

Chemtall Plant

NEW CONDITION

3.2.15 The Permittee shall not discharge or cause the discharge into the atmosphere from Powder Plant Line 12 (Source Code P12) and Powder Plant Line 13 (Source Code P13) combined through Stack UNUP at the Chemtall Plant any gases which:
[Toxic Guideline - 391-3-1-.02(2)(a)1]

- a. Contain acrylamide in excess of 0.314 pounds per hour.
- b. Contain acrylic acid in excess of 3.06 pounds per hour.

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

[Condition 3.5.1 – No Changes]

Chemtall Plant

NEW CONDITION

3.5.2 The Permittee shall operate the Acrylates Polymer Process Thermal Oxidizer (Source Code TOSF) such that a minimum destruction efficiency of 98 percent VOC and HAP is achieved at all times of Acrylates Polymer Process (Source Code SF1) operation.
[391-3-1-.03(2)(c)]

NEW CONDITION

3.5.3 The Permittee shall operate the Acrylates Polymer Process Thermal Oxidizer (Source Code TOSF) during all times of Acrylates Polymer Process (Source Code SF1) operation.
[391-3-1-.03(2)(c)]

PART 4.0 REQUIREMENTS FOR TESTING**4.2 Specific Testing Requirements**

[Conditions 4.2.1 through 4.2.22 – No Changes]

Chemtall Plant**NEW CONDITION**

- 4.2.23 Within 60 days after achieving the maximum production rate at which the Acrylates Polymer Process (Source Code SF1) will be operated, but no later than 180 days following startup, the Permittee shall conduct destruction efficiency testing for VOC and HAP as controlled by the Acrylates Polymer Process Thermal Oxidizer (Source Code TOSF). The results of the performance test shall be submitted to the Division within 60 days of the completion of testing.
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]

NEW CONDITION

- 4.2.24 Within 60 days after achieving the maximum production rate at which Powder Plant Line 12 (Source Code P12) and Powder Plant Line 13 (Source Code P13) at the Chemtall Plant will be operated, but no later than 180 days after startup, the Permittee shall conduct performance tests for particulate matter, acrylic acid, and acrylamide. The results of the performance tests shall be submitted to the Division within 60 days of the completion of testing.
[391-3-1-.02(3) and 391-3-1-.03(2)(c)]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)**5.2 Specific Monitoring Requirements**

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[a. through g. – No Changes]

Chemtall Plant**NEW CONDITION**

- h. Combustion temperature for the Acrylates Polymer Process Thermal Oxidizer (Source Code TOSF).
Data shall be recorded no less than once every five minutes.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[Conditions 5.2.2 through 5.2.19 – No Changes]

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**

[6.1.1 through 6.1.6 – No Changes]

- 6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[a. and b. – No Changes]

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

[i. through viii. – No Changes]

Chemtall Plant**MODIFIED CONDITION**

- ix. Any two consecutive readings during which the pressure drop for a baghouse associated with the Powder Plant or Drum Drying Process (Equipment Groups PP and DD) at the Chemtall Plant, except for Source Codes CP2F, CP2G, CP8D, CP9D, CDD5, CDD6, CP12A through CP12D, and CP13A through CP13D, measured and recorded in accordance with Condition 5.2.2.d, is less than 1.0 inch of water or greater than 10.0 inches of water.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[x. through xix. – No Changes]

Chemtall Plant**MODIFIED CONDITION**

- xx. Any instance an operational or maintenance check required by Condition 5.2.19 that reveals that a maintenance action level was triggered and the maintenance was not performed according to the Preventative Maintenance Program for the following Dust Collectors: Source Codes CP9E, CP9F, CP10E through CP10H, CP11E through CP11H, CP12E through CP12H, and CP13E through CP13H.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

MODIFIED CONDITION

- xxi. Any two consecutive readings during which the pressure drop for Baghouse CP2F, CP2G, CP8D, CP9D, CDD5, CDD6, C12A through C12D, and C13A through C13D at the Chemtall Plant, measured and recorded in accordance with Condition 5.2.2.d, is less than 0.10 inch of water or greater than 10.0 inches of water.
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[xxii. and xxiii. – No Changes]

Chemtall Plant

NEW CONDITION

- xxiv. Any daily average temperature for the Acrylates Polymer Process Thermal Oxidizer (Source Code TOSF), measured and recorded in accordance with Condition 5.2.1.h, that is less than 1410 degrees Fahrenheit or the minimum temperature established through performance testing. For the purposes of this condition, a "daily average" is defined as the 24-hour period from 12 am to 12 am (or other 24-hour period agreed upon by the Permittee and the Division).
[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

[d. – No Changes]

[6.2.1 through 6.2.75 – No Changes]

6.2 Specific Record Keeping and Reporting Requirements

[6.2.1 through 6.2.75 – No Changes]

Flocryl Acrylamide Plant

NEW CONDITION

- 6.2.76 The Permittee shall furnish the Division with written notification of the startup of the modified Flocryl Acrylamide Processes (Equipment Group BIOF). The notification shall be postmarked within 15 days of such date.
[391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]

Acrylates Polymer Process

NEW CONDITION

- 6.2.77 The Permittee shall furnish the Division with written notification of the startup of the Acrylates Polymer Process (Source Code SF1). The notification shall be postmarked within 15 days of such date.
[391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]

Chemtall Plant

NEW CONDITION

- 6.2.78 The Permittee shall furnish the Division with written notification of the startup of Powder Plant Line 12 (Source Code P12) and Powder Plant Line 13 (Source Code P13). The notification(s) shall be postmarked within 15 days of such date. The Permittee shall also furnish written confirmation of the decommissioning of Powder Plant Lines 1 and 2 (Source Codes P1 and P2) postmarked within 15 days of such date.
[391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]

PART 7.0 OTHER SPECIFIC REQUIREMENTS

- 7.4 Insignificant Activities Associated with this Amendment**
(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

7.14 Specific Conditions Associated with this Amendment

[Condition 7.14.1 – No Changes]

NEW CONDITION

- 7.14.2 Powder Plant Line 1 (Source Code P1) and Powder Plant Line 2 (Source Code P2) shall be permanently decommissioned upon startup of Powder Plant Line 12 (source Code P12) or Powder Plant Line 13 (Source Code P13).
[391-3-1-.02(6)(b)(1) and 40 CFR 70.6(a)(3)(i)]

Attachments

B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups

Title V Permit Amendment

SNF - Riceboro

Permit No.: 2899-179-0011-V-02-C

ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

INSIGNIFICANT ACTIVITIES CHECKLIST

Category	Description of Insignificant Activity/Unit	Quantity
Storage Tanks and Equipment	7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia).	379

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

Description of Emission Units / Activities	Quantity
Ethyl Acrylate Tank (Source Cod EA01)	1
Butyl Acrylate Tank (Source Code BA01)	1

SNF HOLDING COMPANY

January 9, 2015

Mr. Kevin Taylor
U.S. Environmental Protection Agency
Region 4
Air and EPCRA Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Subject: **40 CFR Part 63, Subpart FFFF Information Request
SNF Riceboro Facility - Riceboro, Georgia
Georgia Title V Permit No. 2899-179-0011-V-02**

Dear Mr. Taylor:

SNF Holding Company (on behalf of SNF Riceboro facility[SNF-Riceboro]), in response to the information request letter dated December 23, 2014, is requesting an extension until February 27, 2015. As discussed with you during our telephone conversation on Wednesday January 7, 2015, the following is a list of the items from the EPA information request we believe may require an extension to the deadline:

- 1) P&IDs requested in Item 2: Gathering and reviewing the applicable P&IDs for each process will require additional time.
- 2) PFDs requested in Items 2 and 8: Although we have basic process flow diagrams for most of the processes, additional work may be required if it is necessary to add or modify the PFDs to add details such as identifying the vent, liquid, and wastewater streams on each PFD.
- 3) Analysis/documentation of wastewater streams that are/aren't subject to the MON Rule per Items 9 through 14: Additional time will be required to review all potential wastewater streams to ensure that the applicability/non-applicability claims made in previous Notification of Compliance Status reports are still valid for current operations. This may require discussions with current operations personnel and/or sampling of the streams to assess applicability.
- 4) The letter was addressed to John Kasmark, who is no longer employed by SNF, and delivered during the holiday period when many personnel were on vacation, thus delaying delivery of the letter to the correct SNF personnel and commencement of our efforts to respond to the request for information.

Mr. Kevin Taylor
USEPA Information Request – SNF-Riceboro
Permit No. 2899-179-0011-V-02

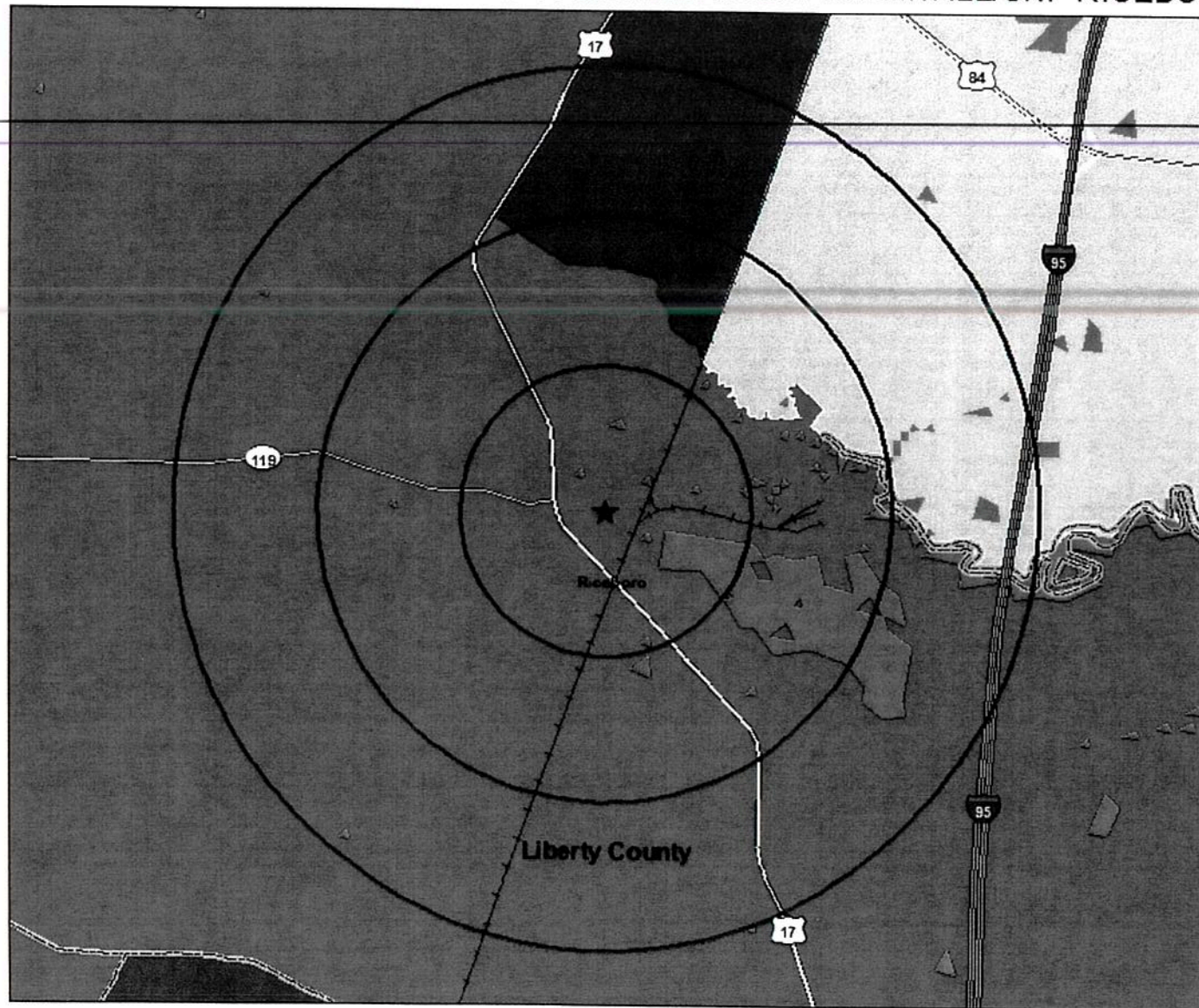
January 2015

Please confirm USEPA's granting of this extension request by contacting me at (912) 884-8736 or via email at bhanson@snfhc.com.

Sincerely,
SNF HOLDING COMPANY

Brent Hanson
Environmental Manager

LOW INCOME & MINORITY AREAS AROUND CHEMTALL/SNF RICEBORO, GEORGIA



Legend

★ Site Location

1. 2. 3mi. Buffer Zones

- Major Streams

- Railroads

Major Roads

= Interstate Highway

- US Highway

- State Highway

- Secondary State Highway

= Other Major Road

No Shield

Counties

Airports

Indian Lands

Water Bodies

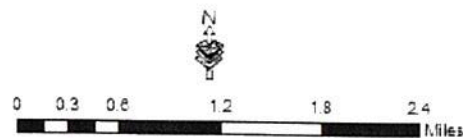
% Low Income & Minority

Low Income

Minority

Low Income/Minority

Below State Average

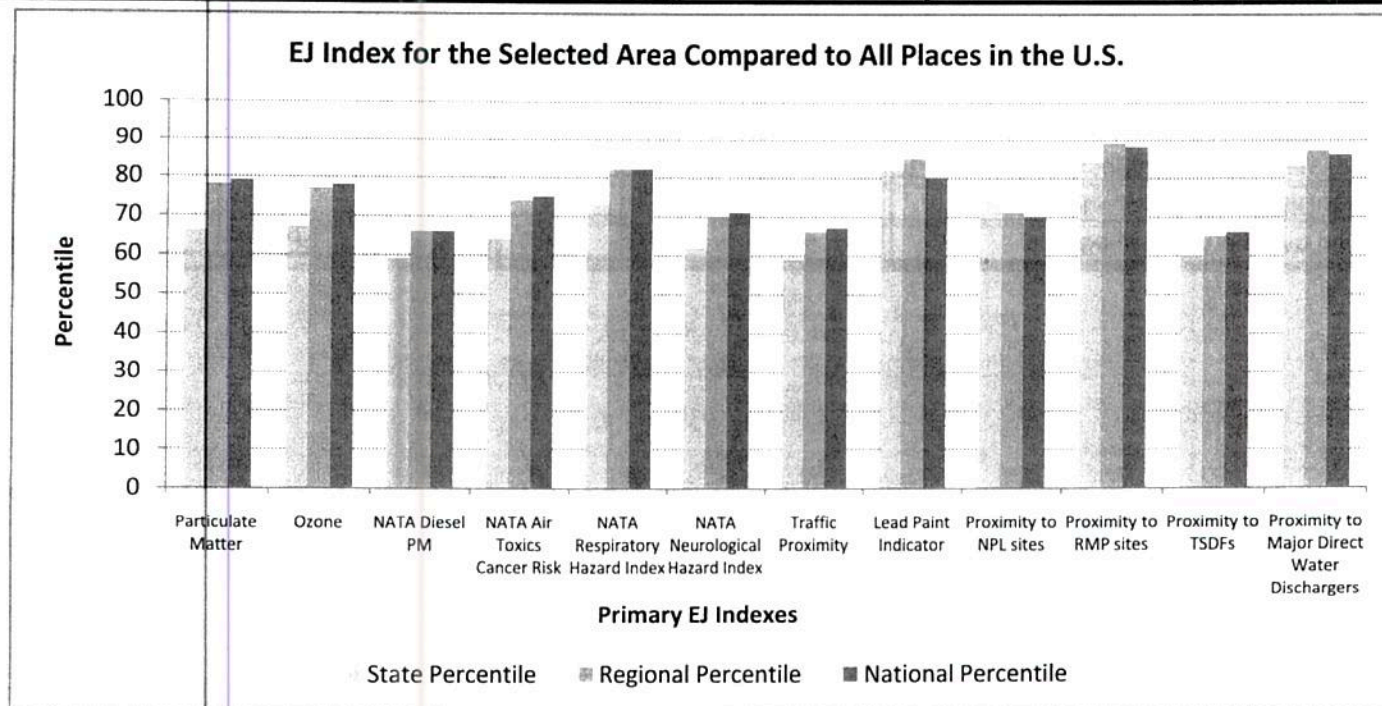


U.S. EPA REGION 4
OFFICE OF ENVIRONMENTAL ACCOUNTABILITY

**EJScreen Report for 1 Mile Ring Centered
at 31.743 N, -81.434 W, Georgia
Approximate Population: 82**

06/03/14

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Primary EJ Indexes			
Particulate Matter	66	78	79
Ozone	67	77	78
NATA Diesel PM	59	66	66
NATA Air Toxics Cancer Risk	64	74	75
NATA Respiratory Hazard Index	73	82	82
NATA Neurological Hazard Index	62	70	71
Traffic Proximity	59	66	67
Lead Paint Indicator	82	85	80
Proximity to NPL sites	74	71	70
Proximity to RMP sites	84	89	88
Proximity to TSDFs	60	65	66
Proximity to Major Direct Water Dischargers	83	87	86



This report shows environmental, demographic, and EJ indicator values. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators.

**EJScreen Report for 1 Mile Ring Centered
at 31.743 N, -81.434 W, Georgia
Approximate Population: 82**

06/03/14

Selected Variables	Raw Data	State Avg.	State %ile	EPA Region Avg.	EPA Region %ile	USA Avg.	USA %ile
Environmental Factors							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	9.99	12	2	10.1	41	10.7	37
Ozone (ppb)	41.2	49.5	7	44.8	34	46	21
NATA Diesel PM ($\mu\text{g}/\text{m}^3$)	0.0628	0.5740	12	0.53	10	0.8250	9
NATA Air Toxics Cancer Risk (risk per MM)	43	68	7	56	15	61	24
NATA Respiratory Hazard Index	3.8	3.1	76	2.7	79	3.1	73
NATA Neurological Hazard Index	0.024	0.0510	7	0.0520	7	0.0630	7
Traffic Proximity (daily traffic count/distance to road)	7.5	110	22	85	21	110	18
Lead Paint Indicator (% Pre-1960s Housing)	0.22	0.14	77	0.17	71	0.31	50
Proximity to NPL sites (facility count/km distance)	0.016	0.0320	71	0.07	30	0.0960	18
Proximity to RMP sites (facility count/km distance)	0.52	0.28	85	0.26	87	0.31	84
Proximity to TSDFs (facility count/km distance)	0.0049	0.02	4	0.0350	2	0.0660	5
Proximity to Major Direct Dischargers (count/km)	0.28	0.19	84	0.19	83	0.25	78
Primary Demographic Index	71%	39%	90	36%	91	34%	91
Minority Population	83%	43%	84	35%	89	35%	87
Low Income Population	59%	36%	86	36%	86	32%	88
Linguistically Isolated Population	null	4%	0	4%	0	5%	0
Population With Less Than High School Education	27%	17%	79	17%	80	15%	82
Population Under 5 years of age	3%	7%	11	7%	17	7%	16
Population over 64 years of age	20%	10%	92	14%	83	13%	85

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

ENVIRONMENTAL JUSTICE CHECKLIST

Part 1: TO BE COMPLETED BY GIS COORDINATOR (Serdar Ertep (2-9683))

Facility Name: Chemtall/SNF Riceboro

Address: Chemical Plant Road, Riceboro, GA 31323

Date EJ Analysis Completed: 6/3/14

Lat/Long: 331.742657/-81.434076

EJSCREEN FLAG (ICIS ENTRY ONLY)

☒ Yes ☐ No

Does EJSCREEN (Block Group) Indicate That Any Environmental Indicator is Above 80%? ☒ Yes ☐ No

Does EJSCREEN (1 Mile Radius) Indicate That Any Environmental Indicator is Above 80%? ☒ Yes ☐ No

Is Low Income Percentage within 1 mile radius \geq State Percentage? ☒ Yes ☐ No

Is Minority Percentage within 1 mile radius \geq State Percentage? ☒ Yes ☐ No

Has the Community Self-Identified as an EJ Area? ☐ Yes ☒ No

Is the Facility Located in a Tribal Area? ☐ Yes ☒ No

Is the Facility located in a Medically Underserved Area? ☒ Yes ☐ No

Are there any Tips and Complaints on the facility? ☐ Yes ☒ No

Is there Any Other Reason to Believe there are any EJ Concerns?
If Yes, Please Explain: ☐ Yes ☒ No

RESULTS OF DATA ANALYSIS:

There are potential EJ concerns regarding the area surrounding Chemtall/SNF Riceboro (facility). The EJSCREEN analysis indicates that one environmental factor within 1 mile of the facility is at or over 80th percentile nationally (RMP Proximity). In addition, within a 1 mile radius surrounding the facility there is a very significant number of minority and low income populations who may be disproportionately affected by environmental problems. Based on the analysis, 83% of the population within a mile is identified as minority, compared to 43% in the State of Georgia and 59% of the population within a mile is identified as low-income, compared to 36% in Georgia. Furthermore, the area also has a population not educated at more than the high school level. 27% was identified as having less than a high school education, compared to 17% in the state. Moreover, the area is designated as a Medically Underserved Area by the U.S. Department of Health and Human Services.

*Standard EJ analyses are conducted within 1-mile radius around the violation location unless you indicate pollutants have migrated further.

ENVIRONMENTAL JUSTICE CHECKLIST

Part 2: TO BE COMPLETED BY THE LEAD PROGRAM CONTACT

Did you visit this facility?

☐ Yes ☐ No

If yes, did you observe any condition (i.e. Presence of dilapidated housing, solid waste dumps, abandoned houses and/or businesses, large rail yards that split communities, number of large facilities, etc.) around the community/location that would indicate that there may be EJ concerns:

☐ Yes ☐ No

If yes, please explain:

Do You Have Any Knowledge That the Community Self-Identified as a Potential EJ Area?

☐ Yes ☐ No

Do You Know Of Any Other Federal Government Knowledge That There May Be EJ Concerns In This Community/Location?

☐ Yes ☐ No

Do You Know Of Any Public Input Indicating that There May Be EJ Concerns?

☐ Yes ☐ No

Do You Know Of Any State/Local/Tribal Government Knowledge Indicating That There May Be EJ Concerns?

☐ Yes ☐ No

Do You Have Any Other Reason to Believe There May be EJ Concerns?
If yes, please explain:

☐ Yes ☐ No

AFTER COMPLETING PART 2, DO YOU HAVE ANY REASON TO BELIEVE THAT THE CONCLUSION DERIVED FROM THE DATA ANALYSIS IN PART 1 IS NOT ACCURATE:

☐ Yes ☐ No

If yes please explain:

Is this request made for:

☐ Inspection

☐ Enforcement Case

☐ Citizen Suit

☐ Other - Please Explain:

*Standard EJ analyses are conducted within 1-mile radius around the violation location unless you indicate pollutants have migrated further.

- 1.) UPON COMPLETION, RETURN A COMPLETED CHECKLIST IN ELECTRONIC FORMAT (I.E., E-MAIL) TO SERDAR ERTEP.
- 2.) ATTACH A COPY TO THE APPROPRIATE ICIS FORM (AADS, REFERRAL, OR BIG CASE PROJECTION FORM)
- 3.) MAINTAIN A COMPLETED COPY OF THIS CHECKLIST IN THE CASE FILE.

-----DO NOT RELEASE-----



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 23 2014

UNITED PARCEL SERVICE

Mr. John Kasmark
Site Manager
SNF - Riceboro/Flocryl, Inc.
P.O. Box 250
Riceboro, Georgia 31323

Dear Mr. Kasmark:

The purpose of this letter is to request information as part of a U.S. Environmental Protection Agency investigation of the SNF Holding Company's SNF- Riceboro facility (SNF - Riceboro), located in Riceboro, Georgia, to determine the compliance status with the requirements of the Clean Air Act (CAA or Act), 42 U.S.C. § 7401, *et seq.*, specifically with the wastewater requirements of 40 C.F.R. Part 63, Subpart FFFF (National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing) for wastewater streams.

Section 114(a) of the CAA, 42 U.S.C § 7414(a), authorizes the Administrator of the EPA to require any person who owns or operates an emission source, whom the Administrator believes may have information necessary for the purposes of Section 114(a), or who is subject to any requirement of the CAA, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the CAA. This authority has been duly delegated to the Director of the Air, Pesticides, and Toxics Management Division Region 4.

Therefore, pursuant to Section 114(a), SNF - Riceboro is directed to respond to the enclosed Information Request (Enclosure A) within thirty (30) days of receipt of this Section 114 Information Request. The EPA, for good cause shown, may extend the deadline for responding to the request. The response to the information requested must be accompanied by the enclosed Statement of Certification (Enclosure C), which is to be signed by a responsible official of SNF - Riceboro. You should respond to this Information Request as completely as possible. The response must be delivered to the EPA or be postmarked no later than the above deadline. Send one complete copy of your response, including supporting documentation, to the following address:

Kevin Taylor
Air & EPCRA Enforcement Branch
U.S. EPA, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Under 40 C.F.R. Part 2, Subpart B, you may assert a business confidentiality claim covering part or all of the information you submit, other than emissions data and information or data that is otherwise publicly available, as described in 40 CFR 2.203(b). The page, paragraph, and sentence must be

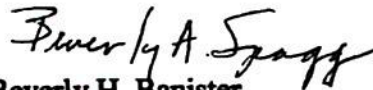
identified for any information subject to a claim of business confidentiality. If no business confidentiality claim accompanies the information when it is received by the EPA, the EPA may make the information available to the public without further notice. Enclosure B specifies the assertion and substantiation requirements for business confidentiality claims. Please note that if the EPA receives a Freedom of Information Act request for information you claim to be business confidential, or wants to determine whether such information is entitled confidential treatment, you will be required to bear the burden of substantiating your confidentiality claim. See 40 C.F.R. § 2.204(a) and (d). In those instances, you will be given an opportunity to submit comments on your claim by responding to 11 questions in Enclosure B. Your comments in response to these questions will be used by the EPA to determine whether the information has been shown to meet the requirements so as to be entitled to confidential treatment. Failure to submit your comments by the deadline in the letter will be regarded as a waiver of your confidentiality claim, and the EPA may release the information.

Failure to comply fully with this request for information is a violation of Section 114 of the CAA and could result in an enforcement action for the recovery of civil penalties not to exceed \$37,500 per day, per violation, or for injunctive relief or both. Section 113, 42 U.S.C. §7413, of the CAA gives the EPA the authority to seek criminal penalties from any person who knowingly makes any false statement, representation, or certification in any report required under the CAA.

This request is not subject to the provisions of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

If you have any questions relating to this Information Request, you may consult with the EPA prior to the above specified time. Questions should be directed to Kevin Taylor at (404) 562-9134 or by email at taylor.kevin@epa.gov. Thank you for your cooperation in this matter.

Sincerely,



Beverly H. Banister

Director

Air, Pesticides and Toxics Management Division

Enclosures

cc: Bert Langley
Director of Compliance
Georgia Environmental Protection Division

Sean Taylor, Manager
Stationary Source Compliance Program
Air Protection Branch
Georgia Environmental Protection Division

ENCLOSURE A

INFORMATION REQUEST

For purposes of this information request, the definitions set forth in Section B shall apply and should be considered carefully by you in preparing your responses.

A. INSTRUCTIONS:

1. Please provide a separate narrative response to each question and subpart of a question set forth in this Information Request and precede each answer with the number of the question to which it corresponds.
2. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response to the EPA. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts; you must provide the EPA with a corrected response as soon as possible.
3. Requested information can be submitted in electronic form if applicable.
4. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Request, you must respond to the Request with a written response.
5. The information requested herein must be provided even though SNF - Riceboro may contend that it includes possible confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Section 114(c) of the CAA, 42 U.S.C. § 7414(c), and 40 C.F.R. § 2.203(b), by attaching to such information at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary," or "company confidential." Information covered by such a claim will be disclosed by the EPA only to the extent, and only by means, of the procedures set forth in the statute and regulation identified above. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.
6. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.
7. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

B. DEFINITIONS:

1. The term "you" or "SNF - Riceboro" shall include SNF Holding Company, its parent corporation(s) and subsidiaries, the addressees of this Request, and the officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents of the above corporations.
2. "Facility" means the plant (including all physical structures) owned and/or operated by SNF - Riceboro, located at Chemical Plant Road, Riceboro, Georgia 31323.
3. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
4. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
5. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee(s) and/or recipient, and the substance or the subject matter.
6. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
7. The term "document" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting (including by way of illustration and not by way of limitation), any invoice, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, inter-office or intra-office communications, photostat or other copy of any documents, microfilm or other film record, photograph, sound recording on any type of device, punch card, disc or disc pack, tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use punch card, disc, disc pack, tape or the type of memory); including (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure, notation, annotation, or the like on it, drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.
8. The term "closed-vent system" is defined in 40 CFR Part 63.161.
9. The term "closed-loop system" is defined in 40 CFR Part 63.161.
10. The term "Group 1 wastewater stream" is defined in 40 CFR Part 63.2550.
11. The term "Group 2 wastewater stream" is defined in 40 CFR Part 63.2550.

12. The term "miscellaneous organic chemical manufacturing process Unit" (MCPU) is defined in 40 CFR Part 63.2550.
13. The term "point of determination" is defined in 40 CFR Part 63.2550.
14. The term "wastewater" is defined in 40 CFR Part 63.2550.
15. The term "wastewater stream" is defined in 40 CFR Part 63.2550.
16. The term "vent stream" is defined in 40 CFR Part 63.111.
17. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the Clean Air Act, in which case the statutory definitions shall apply.

C. INFORMATION REQUEST:

You are hereby required, in accordance with Section 114(a) of the Act, 42 U.S.C. § 7414(a), to provide the following information for SNF - Riceboro in Riceboro, Georgia.

1. For all of the facility operations, identify with specificity each and every process at the SNF - Riceboro facility. Each process should be clearly identified by the name of the process and/or a unique identification number.
2. For each process, provide a process flow diagram and a piping and instrumentation diagram (P&ID) which shows each wastewater stream, liquid stream, and vent stream for each piece of equipment, and this should include, but not be limited to, knock-out pots, liquid ring vacuum pumps, etc. The diagram should illustrate the origin and complete path of each and every wastewater stream, liquid stream, and vent stream with regard to each piece of equipment. Each stream should be clearly identified by the name of the stream and/or a unique identification number of the stream.
3. For each process identified, provide a complete list of the specific hazardous air pollutants addressed by Section 112 of the Clean Air Act that are associated with each process.
4. For each and every process at SNF - Riceboro, identify with specificity which processes are subject to the provisions of 40 CFR Part 63 Subpart FFFF as well as those which are not subject. For those processes which are not subject to the provisions of 40 CFR Part 63 Subpart FFFF, provide the documentation which clearly demonstrates why those processes are not subject.
5. For all of the facility operations, identify with specificity each and every Miscellaneous Organic Chemical Process Unit (MCPU) at the SNF - Riceboro facility and identify the process with which it is associated. Each MCPU should be clearly identified by the name of the MCPU and/or a unique identification number.
6. Provide a complete list of the specific hazardous air pollutants addressed by Section 112 of the Clean Air Act that are associated with each MCPU and each stream.
7. For each and every MCPU at SNF - Riceboro, identify with specificity which MCPU's are subject to the provisions of 40 CFR Part 63 Subpart FFFF as well as those which are not subject. Also, identify each piece of equipment that is part of each MCPU. For the MCPU's which are not subject to the provisions of 40 CFR Part 63 Subpart FFFF, provide the documentation which clearly demonstrates why those MCPU's are not subject.
8. For each MCPU at the SNF - Riceboro facility which is subject to the provisions of 40 CFR Part 63 Subpart FFFF, provide a detailed process flow diagram. The diagram must identify with specificity each and every piece of equipment in the MCPU, and each and every inlet and outlet stream associated with each piece of equipment. The diagram should also differentiate between liquid streams and vent streams, and must identify each and every wastewater stream, and liquid stream in open systems. Each stream should be clearly identified by the name of the stream and/or a unique identification number of the stream by MCPU. Include with this response, the date of construction and commencement date of each MCPU and its associated ancillary equipment.

9. For each wastewater stream and liquid stream identified in item 8 above, clearly specify which streams are subject to the provisions of 40 CFR Part 63.2485(a) through (o) and the requirements of Table 7 of Subpart FFFF as well as those which are not subject. For those wastewater streams and liquid streams which are not subject to the provisions of 40 CFR Part 63.2485(a) through (o) and the requirements of Table 7 of Subpart FFFF, provide the documentation which clearly demonstrates why those streams are not subject.
10. For each wastewater stream and liquid stream identified in item 9 above, provide complete documentation, including applicable dates (e.g., initial compliance date, date that SNF - Riceboro became subject to this rule), diagrams, calculations, and compliance demonstration verification data as well as sampling and analytical results and testing methodologies, which clearly demonstrates the compliance or non-compliance of each stream and how it was determined with regard to the provisions of 40 CFR Part 63.2485(a) through (o) and the requirements of Table 7 of Subpart FFFF and the provisions of 40 CFR Part 63 Subparts F and G as applicable. In other words, clearly specify by regulatory citation from 40 CFR Part 63.2485(a) through (o) and Table 7 of Subpart FFFF and from 40 CFR Part 63 Subparts F and G each provision of these regulations for which each stream is demonstrating compliance. For those situations where the applicable regulations offer compliance options and/or control options, identify which compliance and/or control option was selected for each Group 1 stream and which standard(s) is being met and match that information to the above requested compliance demonstration verification data. As a part of this documentation, clearly identify which streams are classified as Group 1 and which streams are classified as Group 2.
11. For each wastewater stream and liquid stream identified in item 10 above, please provide the documentation which SNF - Riceboro has historically relied upon and currently relies upon to verify and justify why and how the streams are classified as either Group 1 or Group 2. This information should include when these classifications were made. With regard to any streams which have previously been classified as Group 2 streams, please identify all process changes that were made which would have called for a re-determination of group status as described in 40 CFR Part 63.132(c)(3) and 63.132(d)(3). Such process changes would include, but not be limited to, changes in production capacity, production rate, feedstock type, or whenever there is a replacement, removal, or addition of recovery or control equipment. Also, provide the re-determination documentation. In addition, please identify all process changes that were made which would not have called for a re-determination of group status.
12. For each Group 2 wastewater stream and liquid stream identified in item 10 above or any other wastewater stream or liquid stream that may be excluded from Subpart FFFF, please provide any sampling and analytical data that has been collected by SNF - Riceboro in the last five years, as available.
13. For each wastewater stream and liquid stream identified in item 8 above and not also identified in item 9 above, clearly specify and provide the reasons and documentation supporting why those streams are not subject to any of the provisions of 40 CFR Part 63.2485.
14. For each and every wastewater stream and liquid stream identified in item 9 above, provide a detailed discussion of how the company is treating each and every wastewater stream and liquid stream.

15. For each wastewater treatment system, provide a detailed discussion of how the wastewater treatment system operates. This should include a treatment system diagram, a list of all inlet streams to the treatment system, a list of outlet streams from the treatment system, a description on how the company monitors the treatment system to ensure it is operating properly, a complete copy of the treatment system test plan, and a complete copy, including attachments, of the initial compliance demonstration report.
16. As defined and regulated in 40 CFR Part 63 Subpart G, provide a complete list, by name and/or unique identification number, of the wastewater tanks, surface impoundments, containers, individual drain systems, and oil-water separators contained within each process. Also, clearly show where it appears within each MCPU on the P&ID requested in item 2 above.
17. For each process and for each MCPU, provide the date that each one began operation.
18. Provide a copy of the Notice of Compliance Status Report that has been prepared and submitted by SNF - Riceboro pursuant to 40 CFR Part 63.2520(d).

ENCLOSURE B

CONFIDENTIAL BUSINESS INFORMATION (CBI)

Assertion and Substantiation Requirements

A. ASSERTION REQUIREMENTS

You may assert a business confidentiality claim covering part or all of the information you submit, other than emissions data and information or data that is otherwise publicly available, as described in 40 CFR 2.203(b). If no business confidentiality claim accompanies the information when it is received by EPA, EPA may make the information available to the public without further notice. To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by placing on or attaching to the information, at the time it is submitted to EPA, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret" or "proprietary" or "business confidential" and a date if any when the information should no longer be treated as confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. Information covered by such a claim will be disclosed by the EPA only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 C.F.R. Part 2, Subpart B. The EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as "Personal Privacy Information" given that disclosure of such information to the general public may constitute an invasion of privacy.

B. SUBSTANTIATION REQUIREMENTS

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. Part 2, Subpart B. You bear the burden of substantiating your confidentiality claim and must satisfactorily show that disclosure of the information would be likely to cause substantial harm to your business' competitive position; that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent, among other things. Conclusory allegations will be given little or no weight.

Before EPA makes a final determination regarding your claim of confidentiality, pursuant to 40 C.F.R. Part 2, Subpart B, EPA will send you a letter asking you to substantiate fully your CBI claim by answering 11 questions. Your comments in response to these questions will be used by the EPA to determine whether the information has been shown to meet the requirements so as to be entitled to confidential treatment. You must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time will be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information.

EPA will ask you to specify which portions of the information you consider confidential. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Please note that if a page, document, group or class of documents claimed by you to be confidential contains a significant amount of information which the EPA determines is not confidential, your confidentiality claim regarding that page, document, group or class of documents may be denied. Any information not specifically identified as subject to a confidentiality claim may be disclosed without further notice to you. For each item or class of information that you identify as being confidential, EPA will ask you to answer the following questions, giving as much detail as possible, as conclusory allegations will be given little or no weight in EPA's determination:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to the EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? If so, specify which.
5. Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
6. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
7. For each item or category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
8. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, please explain whether the information is the kind that would customarily not be released to the public.
9. Whether you assert the information as voluntary or involuntary, please address why disclosure of the information would tend to lessen the availability to the EPA of similar information in the future.

10. If you believe any information to be (a) trade secret (s), please so state and explain the reason for your belief. Please attach copies of those pages containing such information with brackets around the text that you claim to be (a) trade secret (s).
11. Explain any other issue you deem relevant (including, if pertinent, reasons why you believe that the information you claim to be CBI is not emission data or effluent data).

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2. "Emission data" means, with reference to any source of emission of any substance into the air - (A) information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing; (B) information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and (C) a general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source). 40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

Information designated confidential will be disclosed by EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

ENCLOSURE C

This is to be signed and dated by a duly authorized official of SNF - Riceboro.

STATEMENT OF CERTIFICATION

I hereby certify that the foregoing responses and information provided to the EPA in response to its Clean Air Act, Section 114, Information Request were prepared under my direction or supervision and that I have personal knowledge of all matters set forth in the responses and the accompanying information or that I consulted with individuals having personal knowledge (note, please identify such individuals). I certify that the responses are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature and Date

Printed Name and Title